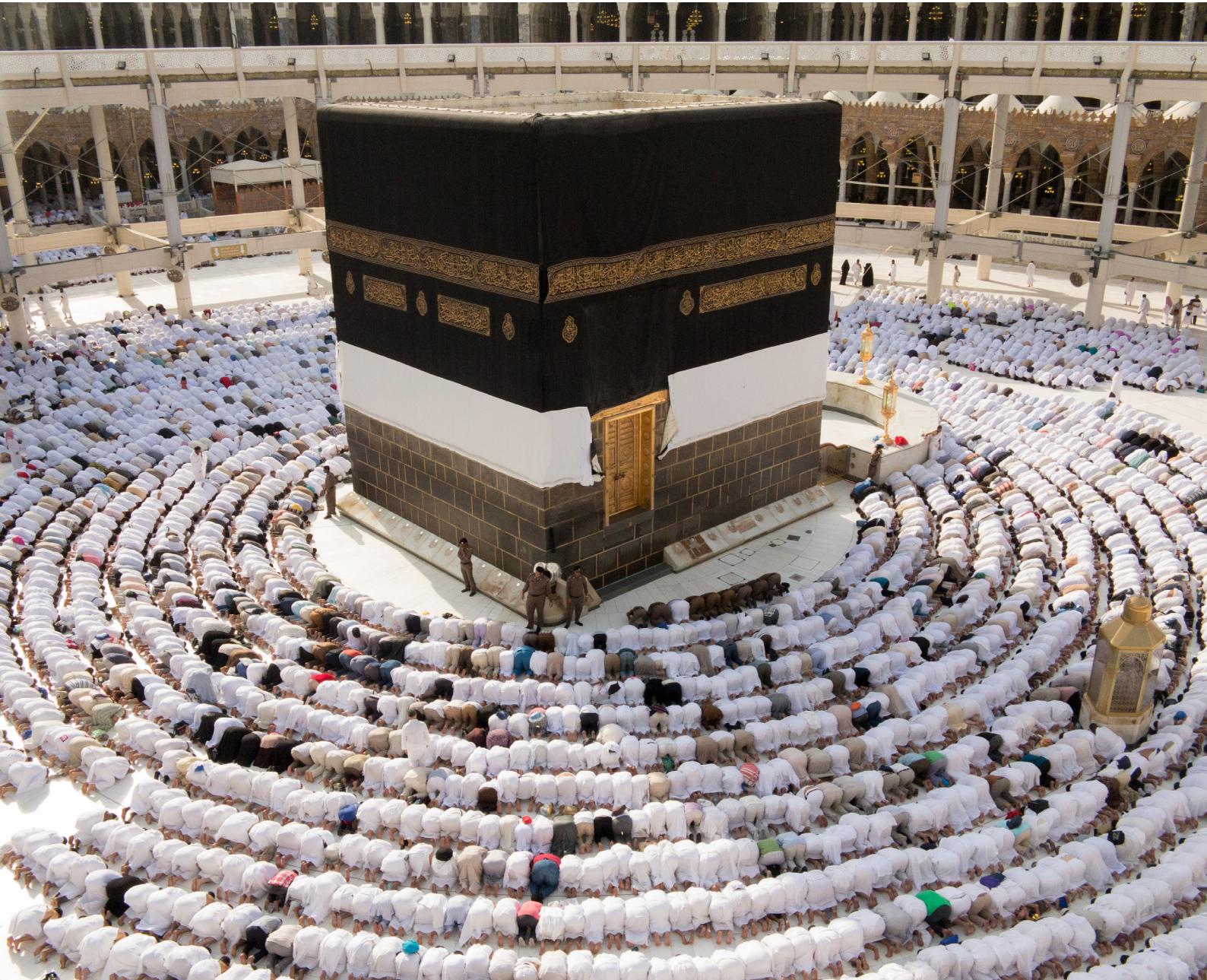


Mapping the UK's Hajj Sector

Moving Towards Communication and Consensus

An Independent Report, 2019

Prof. Seán McLoughlin



UNIVERSITY OF LEEDS

Mapping the UK's Hajj Sector Moving Towards Communication and Consensus

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To find out more about the research leading to this report please visit <https://hajj.leeds.ac.uk/> or contact **Prof. Seán McLoughlin** on s.mcloughlin@leeds.ac.uk or via Twitter [@LeedsUniHajjRes](https://twitter.com/LeedsUniHajjRes).



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Prof. Seán McLoughlin, University of Leeds.

I first became interested in Hajj during the mid-1990s whilst writing-up a chapter of my PhD thesis on British Muslims' transnational connections. At the same time I met Dr Muzamil Khan, when we taught together on a part-time adult education course at Manchester Metropolitan University. He shared with me his experiences of leading small independent groups from his local mosque on the great pilgrimage to Makkah. When I secured a post as Lecturer at Liverpool Hope University College in 1997, I was able to access a small grant to employ Muzamil to begin interviewing the Hujjaj (pilgrims) in his local community (see McLoughlin 2009a; 2009b). So, I will be eternally grateful to him for helping me to develop my interest in Hajj-going from the UK.

In 2011, by which time I had been at the University of Leeds for more than a decade, it was announced that the British Museum would be hosting an exhibition on Hajj. With funds passed through from a large grant to the museum from the Arts and Humanities Research Council (AHRC), I was able to update my research on British Muslim experiences of the pilgrimage, some of which contributed to an exhibit in "Hajj: Journey to the Heart of Islam" (2012). Together with my research assistants (Rabiba Hannan and Dr Asma Mustafa) I began interviewing not just pilgrims but a modest number of Hajj organisers and guides, pilgrim welfare organisations and the relevant UK governance authorities. Without this AHRC-funded opportunity to lead a small research team and collaborate with British Museum curators, Dr Venetia Porter and Qaisra Khan, I would not have been able to begin exploring the organisation and infrastructure of Hajj-going from the UK. Sincere thanks to all concerned.

The award of a British Academy Mid-Career Fellowship during 2013-14 afforded me the opportunity to start writing-up this work (McLoughlin 2013a; 2013b; 2013c) and continue interviewing Hajj sector stakeholders myself. I was also able to develop a website to disseminate my research and present a preliminary report on the UK's Hajj sector to a meeting of the Association of British Hujjaj at Westminster. At the invitation of the Council of British Hajjis (CBHUK) I presented work-in-progress too at a seminar on the UK Hajj during the World Hajj and Umrah Convention, as well as at two Hajj and Umrah Organisers Initiative Forum meetings at the Emirates Stadium, London and Old Trafford Stadium, Manchester. I remain indebted to these organisations for supporting my work in the past.

Academics get to work full-time on their research only periodically, so it was 2017-18 before my next study-leave was granted at the University of Leeds. Therefore I am especially grateful to the School of Philosophy, Religion and History of Science and the Faculty of Arts, Humanities and Cultures for their support. The timing was fortuitous as much of great interest was happening in the UK Hajj sector, no doubt partly in response to a step-change in Saudi Arabia's ambition to double pilgrim numbers by 2030. Two new trade associations were launched in 2016, followed by a high profile industry award ceremony during 2017, and then the inauguration of the All-Party Parliamentary Group (APPG) on Hajj and Umrah in 2018.

One prompt for the idea of a fully-fledged independent report on the UK Hajj sector came from a Bridge Institute-convened meeting in late 2017 to discuss Hajj-related fraud with Steve Reed MP (now APPG Hajj and Umrah Treasurer) and representatives of Croydon Muslim Association. However, it would not have been possible without the financial support of an Economic and Social Research Council (ESRC) Impact Acceleration Award in 2018-19, administered by Leeds Social Sciences Institute at the University of Leeds. Dr Fiona Philip, Impact Support Officer in the School of Philosophy, Religion and History of Science, was instrumental in helping me to develop a successful application.

I was also fortunate to be able to partner with CBHUK, the Secretariat for the new APPG on Hajj and Umrah, which has contributed time and know-how to this project. I am especially grateful to CBHUK CEO, Rashid Mogradia, who has provided me with numerous invitations to disseminate my work among British Muslims during the last decade.

The ESRC award enabled me to employ Wahida Shaffi as a part-time research assistant on the project between January and July 2019. Thanks to her for being so very flexible in her working pattern and for being such an excellent conversation partner too. Together with Rashid, we hosted three consultations with sector stakeholders in the North of England, the Midlands and London during March 2019. Without the willingness of all stakeholders to give so freely and openly of their time and expertise over several years, this report would not have been possible. I am grateful to all concerned.

Finally I would like to thank Alex Santos, Graphic Designer at the Print and Copy Bureau, University of Leeds, for his skill and endless patience in putting the final design of this report together.


Prof. Seán McLoughlin
University of Leeds, Summer 2019

Foreword



Yasmin Qureshi

MP, Chair of the APPG on Hajj and Umrah

Muslim pilgrimage is an essential part of the lives of thousands of our constituents in the UK. However, as Members of Parliament, we hear stories every year of issues impacting pilgrims' well-being while travelling for Hajj and Umrah. Amongst other things, we know that people are concerned about rising prices and the need to better regulate unprofessionalism and fraud among travel agents.

The All-Party Parliamentary Group on Hajj and Umrah was launched in March 2018 to establish the facts about the UK Hajj and Umrah sectors, firstly, by engaging those concerned, then, identifying and understanding key gaps, issues and trends, as well as ultimately recommending ways to improve policy and good practice, while all the time giving a voice to all stakeholders and consumers.

Yet, while Muslims have been travelling to Makkah and Madinah from Britain in their hundreds and thousands since the 1960s and 1970s, virtually no research existed in this field until Professor Séan McLoughlin from the University of Leeds took the initiative to develop an entirely new field of British and European Muslim studies.

Based on research conducted throughout the 2010s, the work he presents here is the first ever independent report systematically mapping in-depth the UK Hajj sector. As such, it transforms the base of knowledge and understanding of its main contours from which the APPG on Hajj and Umrah can develop future deliberation and strategy.

Amongst Professor McLoughlin's recommendations is a call for a more "360 degree approach to sector-wide co-operation and co-ordination", so that a more fully "pilgrim-centred" approach to public awareness of how Hajj is organised can be achieved. His report thus contains landmark resources and insights for all key stakeholders with governance-related responsibilities including licensed Hajj organisers, the Foreign and Commonwealth Office, the Civil Aviation Authority, Trading Standards and the City of London Police (Action Fraud).

Emphasising the importance of moving towards better communication and consensus in the sector, I am delighted that Professor McLoughlin identifies "a pivotal role for the APPG in keeping open a critical and practically-focused public conversation on Hajj and Umrah in the UK". The independence and ethical rigour of the report in terms of its emphasis on consulting stakeholders, speaking openly and enabling productive critical dialogues, as well as its call for transparent information-sharing, are precisely the democratic values the APPG wants to nurture. Thus, this very welcome publication can only lend added credibility to our shared project.

Yasmin Qureshi MP

Shadow Justice Minister

Chair, All-Party Parliamentary Group on Hajj and Umrah



Rashid Mogradia

CEO, CBHUK

Since its formation in 2006 as a pilgrim welfare charity, CBHUK has been a pioneer in building stakeholder partnerships and wider public communication concerning the Hajj and Umrah sector in the UK. We are

honoured to serve as the Secretariat to the All-Party Parliamentary Group on Hajj and Umrah.

I first met Professor McLoughlin in 2011 when he interviewed our award-winning charity as part of his research for an exhibit which featured in the British Museum's 2012 exhibition, "Hajj: Journey to the Heart of Islam". He has subsequently presented his research at a wide range of CBHUK events, from Hajj seminars for pilgrims to Hajj industry debriefs in Parliament.

Therefore CBHUK was delighted to be invited to act as community partner on the "Mapping the UK's Hajj Sector" project. During 2018-19 three stakeholder consultations convened together with Séan and project research assistant, Wahida Shaffi, formed the main work of the APPG sub-group on Hajj-related fraud. Participating in these meetings, I witnessed the immediate positive impact of bringing community organisations, licensed Hajj organisers and governance officers into a critical dialogue.

As this report concludes, there are information and communication gaps, as well as misunderstandings, in many directions, both within the UK sector and across UK and Saudi systems of governance and regulation. As a mirror to all stakeholders, this new resource aids clearer thinking on key questions and increases self-understandings often previously based on particular domains of work.

"Mapping the UK's Hajj Sector" identifies the local and national significance of the commercialisation of global Hajj-going in Saudi Arabia for British Muslims. It also sets two decades of engagement between parliamentarians, stakeholders and communities against rapidly changing social, economic and political climates in the UK. Critical but fair and based on long-term engagement, it alerts us to the perennial nature of our challenges.

Séan's research changes our understanding of key issues such as professionalism and regulation by recovering the collective history of more than 100 Saudi licensed UK Hajj organisers, as well as the delineating local-to-national inconsistencies in reporting complaints and the enforcement of compliance. The interpretation offered here will support industry self-governance, practical improvements in communication and possibly policy changes led by our stakeholders and Parliamentarians. Ultimately, this will benefit more than 125,000 British Muslim Hajj and Umrah pilgrims.

Rashid Mogradia

CEO, Council of British Hajjis (CBHUK)

Secretariat to the All-Party Parliamentary Group on Hajj and Umrah

Organisations and Acronyms



ABTA - Association of British Travel Agents

ABHA - Association of British Hajj and Umrah Agencies

APPG - All-Party Parliamentary Group (on Hajj and Umrah)

ATOL - Air Tours Organisers Licensing

ABH - Association of British Hajjaj

BHD - British Hajj Delegation

BHUC - British Hajj and Umrah Council

CAA - Civil Aviation Authority

CBHUK - Council of British Hajjis

CLP - City of London Police (Action Fraud)

Establishment TEAA - National Tawafa Establishment (Muassasa) of the Mutawwifs of the Pilgrims of Turkey and the Muslims of Europe, America and Australia

FCO - Foreign and Commonwealth Office, UK government

HAG - Hajj Advisory Group

HP - Hajj People social enterprise company

IATA - International Air Transport Association

ICC - Islamic Cultural Centre

LHO - Licensed Hajj Organisers trade association

MABTA - Ministry Approved British Travel Agents

MOH - Ministry of Hajj

MCB - Muslim Council of Britain

MLP - Muslim Leadership Panel

NPOA - National Pilgrimage Organisers Association

OIC - Organisation of Islamic Cooperation

UKEHC - UK and Europe Hajj Corporation

UKHA - UK Hajj Association

UMO - Union of Muslim Organisations

WHUC - World Hajj and Umrah Convention

Glossary



Akhira – the Afterlife

Hajj – the pilgrimage to Makkah and its environs, consisting of rites over 5 days; the fifth pillar of Islam, it is incumbent on all Muslims so long as they have the means and are physically able

Haramain – the collective name given to the two sanctuaries in the holy places of Makkah and Madinah

Hijaz – name given to the west of Arabia, which includes the two holy places of Makkah and Madinah

Hujjaj – Hajj pilgrims

Jamarat – the stone pillars representing Satan, which pilgrims pelt as part of the Hajj rituals at Mina

Ka'ba – the cube-shaped building, typically covered in black cloth, at the centre of Masjid al-Haram and the focus of the circumambulation ritual (Tawaf); the most sacred site in Islam, it represents the House of Allah (God) on earth

Madinah – the city to which the Prophet Muhammad migrated and the site of his mosque and grave, which is often visited by pilgrims who are performing Hajj

Makkah – the birthplace of the Prophet Muhammad, the founder of Islam, and the focus of the Hajj pilgrimage

Masjid al-Haram – the Great Mosque at Makkah, which is the focus of the Tawaf or ritual circumambulation of the Ka'ba at its centre

Mina – the site of the tent city 5km to the east of Makkah which Hujjaj use as a base for rituals such as stoning the pillars (Jamarat)

Muassasa – the Establishment of Mutawwifs for different parts of the Muslim world e.g. Turkey and the Muslims of Europe, America and Australia

Munazzam – a private Hajj organiser, licensed by the authorities in Saudi Arabia to sell Hajj packages and visas

Mutawwif – historically the Hajj ‘guide’, who oversaw a pilgrim’s ritual and physical needs; specialised in terms of hereditary sub-groups for different regions of the Muslim world

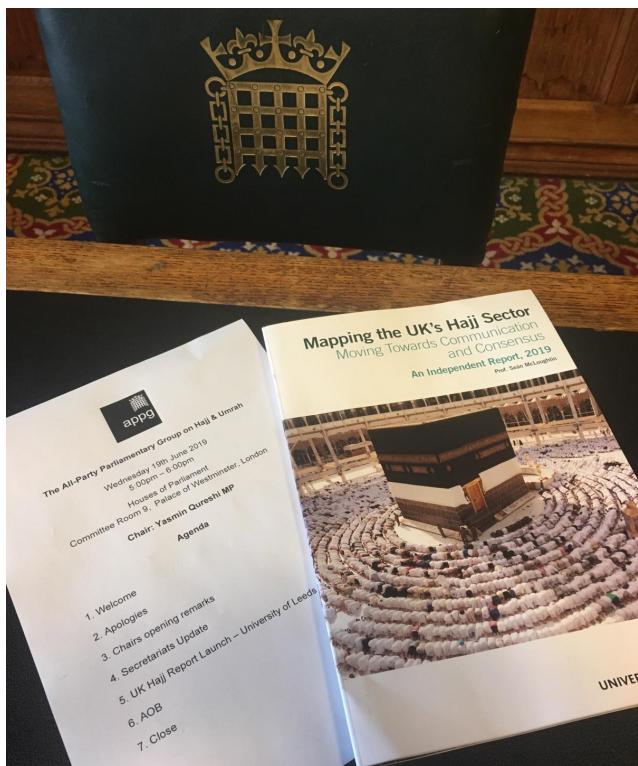
Ummah – the Muslim community worldwide

Umrah – the minor pilgrimage focused around Masjid al-Haram in Makkah, consisting of abbreviated rites, which can be performed in half a day

Timeline

- 1839** - British Consul and Agent appointed in Jeddah
- 1886** - British Viceroy in India engages travel agent, Thomas Cook, to reform Hajj-going from the sub-continent
- 1878** - Muslim public servant appointed assistant surgeon to the British Indian Hajjjaj
- 1882** - First Indian Muslim Vice-Consul at the British Consulate in Jeddah
- 1969** - 759 Hajjjaj travel independently from the UK to Makkah
- 1981** - El-Sawy Travel, London, organises first formal Hajj tour from the UK
- 1985-87** - an average of 4,482 Hajjjaj travel annually from the UK to Makkah
- 1998** - Formation of the Association of British Hajjjaj (ABH) pilgrim welfare organisation, Birmingham
- 2000** - British Hajj Delegation (BHD) of consular officials and volunteer British Muslim doctors established by FCO in partnership with ABH and led at different points by Lord Nazir Ahmed and (from the MCB), Sir Iqbal Sacranie and Lord Adam Patel
- 2004** - Abortive attempt to establish MABTA (Ministry Approved British Travel Agents) trade association
- 2006** - Formation of the Council of British Hajjis (CBHUK) pilgrim welfare association in Bolton
- 2007** - 5000-strong ABH petition to the UK Department for Business, calling for better regulation of the Hajj and Umrah sector
- 2008-9** - Department of Business summit meetings with UK Hajj organisers and others encouraging the trade to work towards better self-regulation
- 2009** - High profile, successful Hajj-related fraud prosecution in East London resulting in prison term for agent, Qibla Hajj Kafela
- 2009** - Formation of UK Hajj Association among British Pakistani Hajj organisers in Bradford and Birmingham
- 2010** - New coalition government announces end of financial support for BHD medical doctors and dignitaries
- 2010** - Formation of Association of British Hajj and Umrah Agencies (ABHA) trade association among British Bengali Hajj organisers in East London
- 2010** - Ramadhan4U blogger, Mohammed Choudhry, attempts to check the credentials of all UK licensed Hajj organisers
- 2011** - First successful prosecution of agent fraudulently selling Hajj packages by Birmingham City Council Trading Standards Department
- 2011** - Idea of a British Hajj and Umrah Council envisioned
- 2012** - Launch of BHD as a private, self-funded British Muslim charitable initiative
- 2012** - Social enterprise company, Hajj People, organises first World Hajj and Umrah Convention, London
- 2012** - Baroness Sayeeda Warsi convenes a National Hajj Taskforce chaired by the Muslim Leadership Panel
- 2013** - Dr. Seán McLoughlin, University of Leeds, launches 'Organising Hajj-Going in Britain: A Preliminary Report' at a meeting of the ABH in Houses of Parliament
- 2014** - The National Trading Standards Board funds a one-year Hajj enforcement project (£100,000) which discovers 81% non-compliance in the sector
- 2015** - My Hajj website launched at Houses of Parliament by National Hajj Taskforce
- 2016** - CBHUK launches the Hajj Awards
- 2016** - Formation of the National Pilgrimage Organisers Association
- 2016** - Formation of the Licensed Hajj Organisers trade association
- 2017** - BHUC convenes meeting of UK Hajj and Umrah related organisations at the Crystal, London
- 2018** - Formation of All-Party Parliamentary Group on Hajj and Umrah, chaired by Yasmin Qureshi, MP, with secretariat provided by CBHUK
- 2018** - LHO launches a draft Code of Conduct
- 2019** - APPG on Hajj and Umrah welcomes Makkah Chamber of Commerce Delegation to London
- 2019** - CBHUK signs Memorandum of Understanding with National Committee for Hajj and Umrah, Saudi Arabia
- 2019** - LHO signs Memorandum of Understanding with Establishment TEAA, Saudi Arabia

Executive Summary: Key Findings



First launch of the *Mapping the UK's Hajj Sector* report, APPG on Hajj and Umrah, Westminster, June 2019

1) Introduction: Moving Towards Communication and Consensus

The institution of Hajj-going is so unique in the context of modern Britain that almost any aspect of it could usefully be “demystified” for the majority of UK pilgrim-consumers and stakeholders. Gaps and misunderstandings are rife. The absence of reliable, public and transparent information does not help. For instance, a definitive ‘live’ list of Saudi licensed private Hajj package organisers for Western countries is difficult to find online. Communications between all stakeholders in the sector could be better. Thus, it is crucial for stakeholders to work together to keep open a critical and practically-focused public conversation on Hajj and Umrah in the UK. If organisations and parliamentarians have the political will, it seems likely that the new All-Party Parliamentary Group (APPG) on Hajj and Umrah formed in 2018, and with the Council of British Hajjis (CBHUK) serving as its Secretariat, will have a pivotal role going forward.

Part I: Stakeholders and Contexts

2) Restructuring the Hajj in Modern Saudi Arabia

The publication of Vision 2030, Saudi Arabia’s strategic plan for the country’s future, represents a revolution in efforts towards modernisation in the Kingdom. With ongoing instability in the price of oil, income from commercialised pilgrimage-based tourism is central to the overall programme for economic and social change. A very ambitious target has been set to more than double current Hajj numbers to 6 million and grow Umrah (minor pilgrimage) numbers to 30 million by 2030. While Saudi Arabia has been improving its infrastructure to meet the challenges of an expanding global demand for Hajj since the

1950s, there is a new impatience to deliver rapid change in the sector with the application of technology seen as a key means of meeting market-based and operational challenges.

3) UK Hajj Organisers: From Independent to Package Travel

During the 2000s the Ministry of Hajj began to regulate private Hajj organisers bringing pilgrims to Makkah from Western countries. While many did not consider this a fully-fledged business, and most groups were small and informal, in 2006 the Ministry made it compulsory for pilgrims to purchase a Hajj package from a fully licensed Hajj organizer (Munazzam). This prompted new company registrations and tentative moves towards greater professionalization of the sector. In 2019 there are around 117 Munazzams in the UK, which is by far the largest number in the West. This figure has grown by about 30% during the last decade and about 20% since Vision 2030 was announced. Officially each Munazzam has an allocation of 150-450 Hajj visas to sell in the UK Hajj market. There are no Munazzams in Scotland, Wales or the North of Ireland.

4) British Muslim Pilgrims and UK Hajj Markets

The number of British Muslim pilgrims has risen from 573 in 1969 to around 25-27,000 in recent years. This represents the joint highest number of pilgrims from the West (alongside France). About 100,000 British Muslims also travel annually for Umrah. Notably, Hajj pilgrims from Western countries are not restricted by the official quota of 1,000 pilgrims per million of total population in Muslim countries. So Muslims in the West benefit from opportunities to go for Hajj largely unavailable to Muslims worldwide. Western pilgrims are also often younger than elsewhere. Overall, CBHUK suggests that this niche sector of the UK economy is worth around £150m (£310m including Umrah). However, despite rising prices, it is unclear whether a growth in visas allocated to the UK during the last decade (about 10-15%) will keep pace with British Muslim population growth (around 30%). Vision 2030 may make this possible.

5) British Muslim Organisations and the UK Government

Together with Lord Nazir Ahmed of Rotherham, in 1999, the Association of British Hajjis (ABH, 1998-) persuaded the Foreign and Commonwealth Office (FCO) that there would be diplomatic advantage at home and abroad in a British Hajj Delegation (BHD). Lord Ahmed led the first delegation in 2000 alongside Muslim Council of Britain General Secretary, (now Sir) Iqbal Sacranie. From 2001 until 2009 it was led by the late Lord Adam Patel of Blackburn. He was accompanied on the delegation by several British Muslim volunteer doctors and FCO staff from the Jeddah Consulate. Government tried to encourage British Muslims to fund the delegation privately and when this failed the new Conservative-Liberal Democrat coalition withdrew its support for all but the FCO consular delegation. While in 2012 BHD did become self-funding, back in the UK, health at Hajj awareness campaigns had been undertaken by ABH and, the Council for British Hajjis (CBHUK, 2006-). However, in the era of a ‘small state’, these pilgrim welfare organisations have differed significantly in terms of their expectations of government and their attitudes to collaborating with Hajj organisers.

Part II: Key Questions

6) Why is the Cost of UK Hajj Packages Rising?

Hajj has always had a commercial dimension. However, an “economy” Hajj package cost more than £4,000 in 2018, which is a genuine concern for those British Muslims on lower incomes especially. Between 2013-14 and 2017-18 the highest Hajj package prices grew around 25%, while the lowest priced packages still grew by 23%. A popular perception is that Hajj organisers are profiteering but organizing Hajj is an especially risky business, more so than the UK travel and tourism sector per se. Rather than payments to suppliers being made after travellers return home, Munazzams pay months in advance.

A fuller breakdown of package costs would be useful for intending pilgrims but factors impacting the rising price of Hajj include: i) Brexit and the drop in the value of the pound; ii) simple “supply and demand” in terms of flights and accommodation as Muslims worldwide seek to be in Makkah for a minimum 1-2 key weeks in the year; iii) a new tax regime in Saudi Arabia from 2018; iv) a hike in the cost of Hajj-related services provided by very profitable Mutawwif companies, with an apparent discrepancy between what UK organisers and pilgrims pay as compared to those from Muslim countries such as Turkey or in South Asia; v) longstanding “Saudi-isation” of a workforce hitherto reliant on economic migrants, which has driven up labour costs. Of course, commercialization of the Hajj per se has also impacted what UK Munazzams consider normal margins and profits.

7) What Factors Contribute to Hajj-Related Fraud in the UK?

Hajj-related deception and fraud in the UK occurs for various reasons. While aspects of planning flights and the delivery of Hajj-related services in Saudi Arabia can genuinely be beyond the control of UK Hajj organisers, when pilgrims are badly let down it is often as a result of failing to manage their expectations, a lack of organization and cutting corners to protect profits. There is also a significant problem in terms of the structure of the marketplace and the unofficial circulation of Hajj visas in the UK. A high proportion of Munazzams actually sell on visas to sub-agents or touts in order to meet their targets in Saudi Arabia. While some sub-agents have proper legal agreements with Munazzams, others do not.

Notably there is a discrepancy here between Saudi and UK law. The latter allows any registered travel agent to create and sell their own packages, including Hajj packages, and to do this without providing a visa at the point of sale. Officially, the Saudis do not allow this. In any case, within long chains of buying and selling Hajj visas, there is a particular problem with misleading promises and advertising at the point of sale. Cash transactions and a lack of documentation in an often informal business economy compound the issues. Hajj organisers also blame some pilgrims for ‘bargain-hunting’ and their lack of knowledge about the market. Some observers argue that many of these problems will ultimately be resolved by technology and social change as the buying and selling of visas moves online but that view may be too optimistic.

8) How is the UK Hajj Sector Regulated and Governed?

During the last decade UK government has taken a two-pronged approach to issues of Hajj-related non-compliance and fraud issues. Firstly, it has emphasized better industry self-regulation. Secondly, it has sought to promote better awareness of consumer rights among British Muslims. In terms of the latter, often it is charitable organisations such as ABH and CBHUK, as well as professional goodwill ‘beyond the day job’ among individual governance officers, that together drives pilgrim education.

In terms of better industry self-regulation, a 2008-09 Department of Business summit did lead to a rise in ATOL (Air Tours Organisers Licensing) registrations. However, a one-year National Trading Standards Board Hajj enforcement project led by Birmingham City Council Trading Standards Department, still found 81% non-compliance in 2014-15. Some Hajj organisers would actually like the UK authorities to more proactively enforce the existing regulatory framework. However, low levels of complaints and scarce resources mean that levels of enforcement are very locally inconsistent and the default regulatory position is often ‘trusting’ that all is well.

City of London Police (Action Fraud) is the national clearing-house for every fraud report countrywide but to warrant further investigation by local authority trading standards departments complaints may need to reach a certain threshold and/or be mobilized by community groups, invested governance officers and MPs. The boundary between civil and criminal cases does not seem to be consistently interpreted and applied. Based on the evidence available, there is a judgement call on a case-by-case basis as to whether it is in the public interest to prosecute. Prosecutions may take 2-3 years to come to court and even then may not result in compensation.

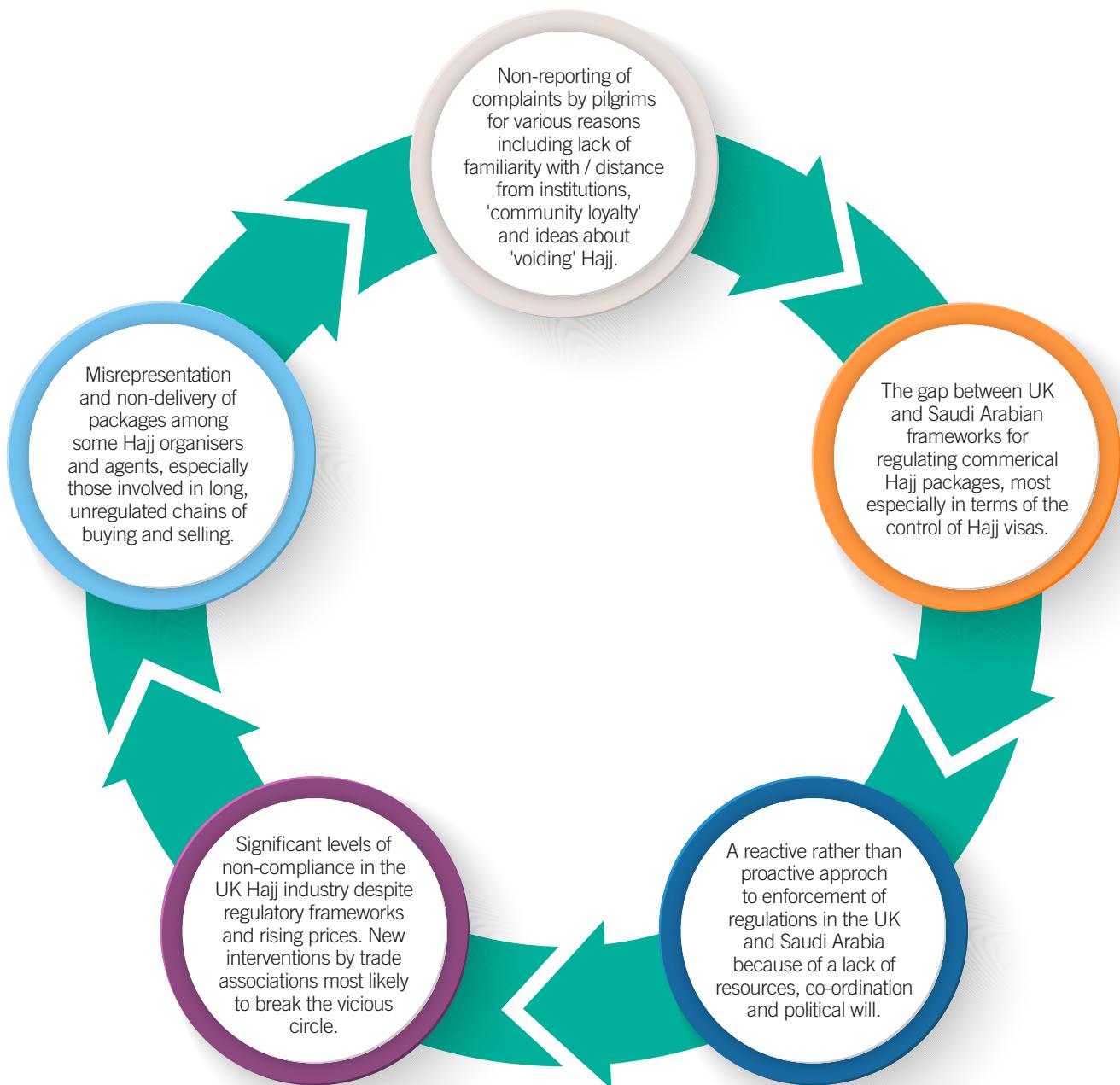
9) How Professional is the UK Hajj Sector?

The UK Hajj sector does not have a reputation for professionalism. Until the mid-2010s it had struggled to establish a viable national trade association. Like-minded ‘second-generation’ organisers, however, are changing this; together they have the social and educational capital necessary to overcome divisions between traders and to offer leadership appropriate to modern Hajj organisation and governance.

Building on earlier attempts to form a UK Hajj trade association, and in competition with entrepreneurs and a parallel National Pilgrim Organisers Association (2016-) rooted in the Umrah sector, Licensed Hajj Organisers (LHO, 2016-) is now claiming precedence in representing the UK Hajj market. It emphasizes that it is Munazzams who have responsibility for British Muslim pilgrims under both UK and Saudi systems of regulation.

Around 60% of licensed Hajj organisers are members of LHO and a shared platform has been created to represent their collective interests to the Saudi authorities. LHO seems determined to take the lead in gradually improving self-regulation and self-governance of the UK Hajj industry. Its most significant challenges will be ensuring members’ compliance with its new Code of Conduct and communicating effectively with pilgrims. It will also need to develop better relationships with UK governance authorities.

Hajj-related Fraud in the UK: a Vicious Circle



Executive Summary: Key Recommendations

1) Advancing effective Hajj industry self-governance across its work in the UK and Saudi Arabia through organisations like Licensed Hajj Organisers is imperative, with due consideration needing to be given to:

- a) Developing a UK industry kite-mark or equivalent (e.g. becoming a Trading Standards approved body)
- b) Paying greater attention to pilgrim awareness of the marketplace e.g. with more transparent information concerning relationships to sub-agents
- c) Implementing a Code of Practice with attention to industry discipline and compliance rather than simple benchmarking
- d) Appointing an independent scrutiny panel and/or advisory board to represent wider pilgrim-consumer and governance interests



Licensed Hajj Organisers' meeting, London, 2018.

2) A UK national body or group of all key stakeholders with access to key political and policy influencers in the UK is required to enable better co-ordination and open, well-informed and critically reflective communication sector-wide. The most obvious mechanism for this is the non-partisan APPG on Hajj and Umrah. Attention needs to be paid to:

- a) Better understanding of the role of different stakeholders and building stronger relationships between them
- b) Taking a "360 degree" view of the sector including the significance of both UK and Saudi settings
- c) Greater transparency and consistency in terms of Saudi and UK local-national listings, reporting, information-sharing and follow-up actions, with any existing mechanisms for the above to be reviewed
- d) Actively joined-up thinking and pooling of resources where possible to amplify common messages to consumers via a wider range of stakeholders, including diverse organisations



All-Party Parliamentary Group (APPG) on Hajj and Umrah, 2018.

3) A more integrated and "pilgrim-centred" approach to consumer advice and awareness among all stakeholders is also essential:

- a) Encourage pilgrims to exercise due diligence when selecting ATOL-protected Hajj organisers and travel agents with secure access to Ministry of Hajj visas
- b) Ensure that pilgrims have easy access to better information and listings when selecting ATOL-protected Hajj organisers and travel agents with secure access to Ministry of Hajj visas
- c) Stakeholders also need to identify ways and means of scaling-up education and preparation for all intending Hajjaj, e.g. by working with the trade to explore the use of technology and/or make a pre-Hajj seminar compulsory, with appropriate attention to matters such as health and safety, as well as the needs of specific segments of pilgrims e.g. women
- d) Work with researchers to develop a project to document and explore the UK Hajj Sector and the issues raised in this report from a "pilgrim-centred" perspective e.g. through an online survey and focus groups in London, the Midlands and the North of England



Hajj pilgrims from the North of England, 2010.

i) Advancing effective Hajj industry self-governance across its work in the UK and Saudi Arabia.



ii) A UK national group of all key stakeholders with access to key political and policy influencers in the UK to enable better co-ordination and open, well-informed and critically reflective communication.



iii) A more integrated and better amplified "pilgrim-centred" approach to consumer advice and awareness.

1. Introduction: Moving Towards Communication and Consensus



Bradford consultation, March 2019. Wahida Shaffi.

Once every year Muslims from across the globe gather in Makkah for the Hajj pilgrimage. As long as they are fit and financially able, travelling to perform these sacred rituals is an obligatory act of worship that followers of Islam owe to God once in their lifetime. Re-enacting the faith-testing ordeals of Ibrahim (Abraham, the Biblical founder of monotheism) and his family, Muslims believe that an “accepted Hajj” will cleanse them of all their sins. Their hope is to return home as pure as the day they were born.

1.1) The Changing Face of Hajj

However, until the introduction of modern transport systems, most Muslims beyond the Arab world had little expectation of completing this fifth and final pillar of Islam. Before the mid-1950s, the number of overseas pilgrims rarely exceeded 100,000. Yet by the early 2000s, the total number of Hujjaj in Saudi Arabia had passed the 2m mark, reaching a peak of just over 3 million in 2012 (Al-Arabiya, 29 October 2012).

In the UK the number of British Muslim pilgrims has risen from 573 in 1969 to around 25-27,000 in recent years. About 100,000 British Muslims also travel annually for Umrah, the minor pilgrimage consisting of abbreviated rites. Indeed, the Council of British Hajjis (CBHUK) suggests that this niche sector of the UK economy is worth around £150m (£310m including Umrah).

1.2) Some Key Challenges

However, those that organise Hajj-going from Britain are still striving to professionalise their sector and respond collectively to some key challenges. For example, the buying and selling of Hajj trips has deep roots in an informal transnational economy, which is now regulated by both Saudi and UK law. Moreover, an “economy” Hajj package cost more than £4,000 in 2018, with prices having risen around 25% in recent years. And every year there are also reports of some pilgrims not getting what they were promised by Hajj organisers or their agents.

A few examples of recent problems include the following cases:

- An agent in East London sold Hajj packages to pilgrims assuming that he could subsequently arrange the Ministry of Hajj license in Saudi Arabia that would give him access to the necessary visas; however, the license did not materialise and so the disappointed pilgrims could not travel.
- Pilgrims from Croydon were promised flights on one airline by an agent in Manchester but were forced to fly on another airline on different dates and were then accommodated in hotels other than those promised, as well as returning to the UK on a flight to Manchester rather than to Heathrow as expected.

- An agent in West Yorkshire allegedly promised pilgrims 3* accommodation but only 1* or worse was delivered; ensuring that sufficient reports of this were recorded for investigation involved co-operation between CBHUK, City of London Police, Trading Standards and the local MP.



London consultation, March 2019. Wahida Shaffi.

1.3) Knowledge and Understanding

Despite the fact that such issues have been common for at least the last two decades, some or other aspect of knowledge and understanding about the UK Hajj and Umrah sector, its regulation and governance is challenging for most stakeholders. Hajj is one of the five iconic pillars of Islam, but unlike prayer or fasting it is still often a once in a lifetime journey and certainly not something that Muslims do every day, month or year. Indeed, the institution of Hajj-going is so unique in the context of modern Britain that it could usefully be demystified for all concerned, not only pilgrims and Muslim associations, but also the UK authorities and even some UK pilgrimage organisers themselves. There are information gaps and misunderstandings in many directions.

1.4) Reliable, Transparent Information

The absence of reliable, publicly-accessible and transparent information about such matters does not help. For instance, during the last decade, a definitive ‘live’ list of licensed private Hajj package organisers for Western countries has often been difficult to find online. In their English language versions at least, the websites of the Ministry of Hajj and Embassy of Saudi Arabia in the UK have not provided up to date annual lists for Britain. This has been a problem for intending pilgrims and governance authorities, as well as researchers.

Some public-minded and resourceful British Muslim bloggers have long since sought to make sense of the business of choosing a Hajj organiser, but not surprisingly their efforts have been unsustainable. British Muslim charities and key UK governance authorities have also launched annual campaigns to highlight key aspects of advice for pilgrim-consumers. However, viewed from a UK regulatory perspective, Hajj has typically been framed as another form of package travel. In general, the significance of Saudi rules about who can legitimately sell Hajj visas has been downplayed. Yet, as these rules differ from those in the UK, this information gap is responsible for at least some of the sector’s problems. To deliver full, relevant advice that is more clearly pilgrim-centred,

all stakeholders require a more 360 degree view of the UK Hajj sector.

Until now, there has been no academic or policy-related research on the organisation of Hajj-going from the UK apart from my own preliminary work (McLoughlin 2013a; 2013b; 2013c). This report is therefore the first evidence-based, independent mapping and analysis of the economic, social, cultural and political dynamics of the UK Hajj sector and the ways that the pilgrimage is organised transnationally across the settings of Britain and Saudi Arabia. The hope is that it will become a useful resource for stakeholders seeking to close the information gap and develop strategy in the UK and beyond. However, it does not directly address the related but separate dynamics of the UK Umrah sector.

1.5 Consulting Stakeholders



Bradford consultation, March 2019. Wahida Shaffi.

During three successive weekends in March 2019, representatives of i) Muslim community organisations; ii) UK Hajj organisers; and iii) UK governance authorities were invited to half-day consultation meetings in Bradford, Birmingham and London. These locations were chosen because of concentrations of both Muslim population and Saudi licensed UK Hajj organisers. Our timeframe for meeting was also limited because Hajj organisers would be away for Umrah over Easter and during Ramadhan, while the report itself had to be published in the period before Hajj.

In total, there were 23 participants across three meetings. At the first two we were also pleased to welcome respectively, Imran Hussain MP and Lord Qurban Hussain, both APPG on Hajj and Umrah vice-chairs. I also conducted three interviews separately with representatives of governance agencies unable to attend. In total these in-depth conversations produced just over 100,000 words of professionally produced transcripts for analysis and interpretation.



Birmingham consultation, March 2019. Wahida Shaffi.

While the aim was always to keep numbers deliberately small to promote high quality critical reflections, the consultations attracted stakeholders already interested in developing the UK Hajj sector. As such they represent an influential minority of the actors in each of their fields, be they Muslim organisations, Hajj organisers or UK governance authorities. Thus, another challenge for the sector is sharing conversations about Hajj and Umrah in the UK more widely, something this report may facilitate. However, compared to other pressing matters impacting British Muslim communities such as Islamophobia and radicalisation, pilgrimage is often perceived as a niche topic.



Project consultations poster, March 2019.

1.6 Building on Long-Term Research

An important point here is that while the final report was informed by these consultations it has also been shaped by my ongoing but intermittent research on Hajj-going in Britain during 2011, 2013-14 and 2017-19. This body of data now includes more than 30 hours of in-depth, semi-structured interviews of 1-2 hours duration with 27 key stakeholders. It also includes my observations at numerous sector fora and events since 2013. Hopefully, gradually sifting this body of data over many days, weeks, months and years has helped me to read between the lines when necessary and put what stakeholders do and say in 2019 in a longer view.

1.7 Answering Four Key Questions

The consultations were focused around four interrelated questions, which together articulate the most common concerns within the sector and which are addressed in Part II of the report:

- i) Why is the cost of Hajj rising?
- ii) What factors contribute to (so-called) Hajj-related fraud?
- iii) How is the Hajj sector regulated and governed?
- iv) How professional is the Hajj sector?

1.8 Enabling Critical and Productive Dialogues

An immediate benefit of the consultations was to bring those with different starting points and perspectives into conversation with one another. It is clear that communications between all stakeholders in the sector could be better. For instance, while it was important for Hajj organisers to hear about grassroots' experiences, Muslim community associations also listened to Hajj organisers speak about the exceptional challenges and risks that they face as compared to the travel and tourism sector per se. Similarly, trading standards and other authorities acknowledged significant discrepancies in UK and Saudi systems of regulation, while Hajj organisers were clear that they now have an appetite for greater self-regulation.

UK Muslim community association -

*For a lay person it is very difficult to understand.
Some of the things I've heard today give me a better
understanding of the issues.*

Licensed UK Hajj organiser -

*Us tour operators have to remember that a lot of
these pilgrims are travelling for the first time for Hajj
because for us it's the norm.*

1.9) Trust, Confidentiality and Speaking Openly

Participants were able to be honest and frank in part because I had built up familiarity with key actors in the sector over several years, both during interviews and at sector events, but also because they were assured of the confidentiality of their specific remarks. The politics of speaking openly on the regulation of Hajj-going, for instance, was significant not only for pilgrimage organisers alert to sensitivities in Saudi Arabia but also UK governance authorities only too aware of inter-agency relations and resourcing issues. Participants also had the opportunity to comment on both a transcript of the consultation meeting they attended and had access to this report before its final publication online.



Birmingham consultation, March 2019. Wahida Shaffi.

Inevitably, there will still be stakeholders who disagree with and seek to correct the facts and interpretations presented here. The report does seek to offer a well-informed and independent long-term view, yet it also represents my own snapshot of a sector that is continually evolving. Even while drafting this text important new developments were being reported. So, ideally this report will raise questions for all stakeholders including the authorities just as much as Hajj organisers or Muslim community organisations. It also points to the need for further research, something addressed in the Conclusion.

Of course, the sector is a competitive environment with many different actors seeking to advance their individual as well as collective interests. However, the rapid pace of change in Saudi Arabia, means that it is crucial to keep open a critical and practically-focused public conversation on Hajj and Umrah in the UK. If organisations and parliamentarians have the political will to really make a difference, it seems likely that the new All Party-Parliamentary Group on Hajj and Umrah formed in 2018, which has already given new impetus and focus to discussions, will be pivotal in this regard.

1.10) Lessons from Past Initiatives

As the Timeline on page 7 underlines, discussions between Muslim communities, the UK governance authorities and Hajj organisers have been evolving for some time. The evidence is that ideas and initiatives can take a significant amount of time to mature. Future sustainability for any developments also remains a significant concern.

- 2019 is almost 20 years since the Foreign and Commonwealth Office introduced consular support on the ground in Makkah, initially sponsoring the British Hajj Delegation (2000-10) of Muslim members of the House of Lords and a team of volunteer doctors.
- It is 15 years since the first attempt to set up a national Hajj organisers' trade association, MABTA (Ministry Approved British Travel Agents).
- A decade has passed too since a Department for Business summit nudged Hajj organisers towards better industry self-regulation.
- Baroness Sayeeda Warsi initiated the National Hajj Taskforce 5 years ago but despite aiming to produce a national source for pilgrim consumer advice (<http://myhajj.org.uk/index.html>), the relevant website is now out of date.
- Around the same time a one-year National Trading Standards Board Hajj enforcement project discovered 81% non-compliance rates among travel agents in the sector but did not have the resources to continue this work.



London consultation, March 2019. Wahida Shaffi.

1.11) Report Structure

I begin in Part I (Chapters 2-5) by showing how the organisation of the Hajj has been reformed and commercialised in Saudi Arabia during the last two decades, documenting how this has impacted the structures of organising Hajj-going from the UK. Having summarised changing pilgrim profiles and patterns of supply and demand in different segments of the UK Hajj marketplace, I then outline how the involvement of British Muslim community organisations and government in Hajj-going has evolved since the late 1990s, with a focus on health and safety.

Next, in Part II (Chapter 6-9) I turn to the four questions central to the March 2019 stakeholder consultations, highlighting the factors contributing to: i) rising Hajj package prices and ii) Hajj-related fraud, as well as iii) the challenges for UK agencies in regulating the sector. Finally, iv) I address the efforts to develop greater professionalism that UK Hajj organisers and others are seeking to take forward through new trade associations which focus on better self-regulation in dialogue with other stakeholders.

The recommendations from the stakeholder consultations are highlighted on page 11.



2. Restructuring the Hajj in Modern Saudi Arabia



Investing in the infrastructure of Masjid al-Haram, Makkah.

The end of colonial rule and the absence of world wars in the last 50 years has made the secure movement of pilgrims across the globe much easier than in the past (Bianchi 2004). From the mid-1970s onwards especially, fast, inexpensive air travel has also made time and distance less of an obstacle. Hajj journeys can now be counted in weeks rather than months or even years.

In the 1980s, annual overseas Hajj pilgrim numbers first exceeded 1 million. However, this volume of traffic has put immense pressure on the infrastructure of the holy places during recent decades. UK Hajj organisers and guides now compare overseeing the pilgrimage to Saudi Arabia hosting the Olympics every year. They emphasise that infrastructure and services are improving year on year.

2.1) Investing in Infrastructure

The Kingdom's historical dependence on Hajj for revenue ended in the years following the discovery of oil in the late 1930s. However, Saudi Arabia was only just becoming a settled, rather than a nomadic, society, and was still in the early stages of selectively developing the institutions of a modern state (Peters 1994; Commins 2012). In 1950 there were only two paved roads in the country. But, in 1957, an initial expansion of al-Masjid al-Haram (the Great Mosque) was funded in large part by income from oil.

As global oil prices quintupled during 1973-4 further expansion of Hajj infrastructure was initiated, including a massive bridge to better facilitate the stoning of the Jamarat (pillars) at Mina. The House of Saud was able to demonstrate its largesse to the 'guests of God', and so lend authority to its growing claims to lead the Muslim Ummah (community) worldwide.

2.2) Managing Rising Numbers

However, as Hajj numbers grew, so too various disasters during the pilgrimage resulted in a large-scale loss of human life. The severe heat, the prolonged duration of the rituals and the sheer number and proximity of pilgrims from diverse locations all intensifies risks to health and safety, especially among the elderly and infirm (Gatrad and Sheikh 2005). A Hajj Research Centre established in Saudi Arabia during 1974 also warned of the negative effects of such rapid modernisation on the environment and heritage in Makkah (Sardar and Badawi 1979; cf. Sardar 2014).

Despite huge investment in continually seeking to improve facilities and the overall management of the Hajj, on several occasions during the 1990s and 2000s hundreds of pilgrims still died in fires and especially stampedes. Further major works including a new bridge and multi-storey system for stoning of the pillars seemed to have been effective. Moreover, Hajj visa quotas were actually reduced worldwide by 20% during 2013-16. However, in 2015 hundreds and possibly thousands of people were killed in another crush.



Pilgrims approaching the Jamarat bridge © Simon Martin, 2009. Creative Commons licence – "CC-BY"

2.3) A Quota System

In 1988, the Organisation of Islamic Cooperation, a vehicle for Saudi pan-Islamism, decided to limit Hajj numbers by setting a quota for each Muslim country at 1,000 pilgrims per million of total (Muslim) population (Bianchi 2004). Thus, the most populous Muslim countries currently have the biggest annual Hajj contingents.

Highest Hajj Quotas: (Source: ilmfeed.com, 27 August 2017)

- Indonesia (221,000)
- Pakistan (179,210)
- India (170,000)
- Bangladesh (127,198)
- Egypt (108,000)
- Iran (86,500)
- Turkey (79,000)
- Nigeria (79,000)

Unlike Muslim-majority nations, Muslim minorities in the West are not restricted to the Hajj quota. They are treated as a special case. Thus, Muslim minorities benefit from opportunities to go for Hajj largely unavailable to other Muslims, who may have to wait decades for their chance. At the 2018 World Hajj and Umrah Convention in London the Indonesian delegation reported that waiting times for intending Hujjaj can be 30 years. In Malaysia it can literally be a lifetime.

2.4) Diversifying Saudi's non-Oil Economy

The modern development of the Hajj must also be understood in terms of the ongoing challenge that Saudi Arabia faces in terms of diversifying its non-oil based economy (Burns 2007). After the

initial boom of the 1970s it became clear during a period of global recession that the population of Saudi Arabia was growing but youth unemployment was rising and living standards declining. Into the 1990s, the development of tourism was identified as having specific potential in addressing such problems (Sadi and Henderson 2005). The Kingdom also embarked on an ambitious programme of the ‘Saudization’ of its workforce, which has hitherto relied heavily on expatriates. For instance, in the mid-2000s only 16% of hotel staff were Saudi nationals (Burns 2007: 232).

2.5 Pilgrimage and Tourism

In the 2000s, pilgrimage was still the country's third largest industry. 58% of international tourist arrivals in Saudi Arabia were for Hajj or Umrah and 47% of international tourism expenditure in 2001 concerned Hajj or Umrah (Burns 2007: 229). Together with private capital investment partners, and boosted by rising oil prices, the Kingdom started to develop accommodation, retail and related services in Makkah, with a view to significantly increasing pilgrim (and especially ‘premium’ pilgrim) numbers. With fierce competition between multinationals for Makkah's prime real estate, costs in every part of the industry were driven up. In 2011, the city's Chamber of Commerce estimated that \$10 billion had been spent by pilgrims during Hajj (BBC News Online, 25 October 2012).



Bank note, Saudi Arabia.

2.6 Vision 2030 and UK PLC

The publication in 2016 of Vision 2030, which is Saudi Arabia's strategic plan for the future, represents a revolution in efforts towards modernisation in the Kingdom. With ongoing instability in the price of oil, pilgrimage remains central to the overall programme for economic and social change. However, it is now being linked even more clearly to a wider tourism agenda. A very ambitious target has been set to more than double current Hajj numbers to 6 million and grow Umrah numbers to 30 million by 2030.

As an increasingly year-round, non-obligatory minor pilgrimage, Umrah takes just half a day to complete. Thus, pilgrims will be free to visit huge new tourist sites to be developed on the Red Sea coast, the ruins at Al-‘Ula or go shopping in Jeddah. US\$50 billion of investment in infrastructure includes a new airport in Jeddah set to open in late 2019. A new Haramain High-Speed Railway linking Makkah-Jeddah-Airport-Madinah, which promises to slash travel times, opened in September 2018.

Notably, its stations are designed by UK-based architectural design and engineering firm, Fosters and Partners, who have also been involved in the Jabal Omar development of luxury hotels with unobstructed views of Masjid al-Haram. Indeed, a delegation

of 45 companies from Makkah's Chamber of Commerce also visited London in Spring 2019. The delegation highlighted strategic and private investment opportunities in franchising, consumer technology and smart cities, emphasising that the aim of Vision 2030 is to offer pilgrims the best possible services .

2.7 The Ministry and the Mutawwifs

The Ministry of Hajj and Religious Endowments has its origins in the Directorate General of Hajj Affairs established by Saudi Arabia under the Ministry of Finance in the 1930s (Long 1979). When the Saudis took control of the Hijaz area of Western Arabia during the previous decade, Hajj was the most significant source of revenue for the Kingdom. The Ministry of Hajj's main role was to regulate the services provided to pilgrims by guilds known collectively as Mutawwifs (literally those who historically supervised the Tawaf, the circumambulation of the Ka'ba).

When the modern Hajj began to expand a single statute regulating the Hajj industry was issued in 1965 and then in 1967 new regulations created a National Tawafa Establishment or Muassasa system which sub-divided the Mutawwifs by (often very long-standing) regional specialization (Long 1979). Henceforth they would cater for pilgrims from just one of the following groups: i) Arab countries; ii) non-Arab African countries; iii) Iran; iv) South Asia; v) South-East Asia; and vi) Turkey and the Muslims of Europe, America and Australia (Establishment TEAA).



UK pilgrims in Mina © Simon Martin, 2009. Creative Commons licence – “CC-BY”

2.8 Modern Hajj Governance in Saudi Arabia

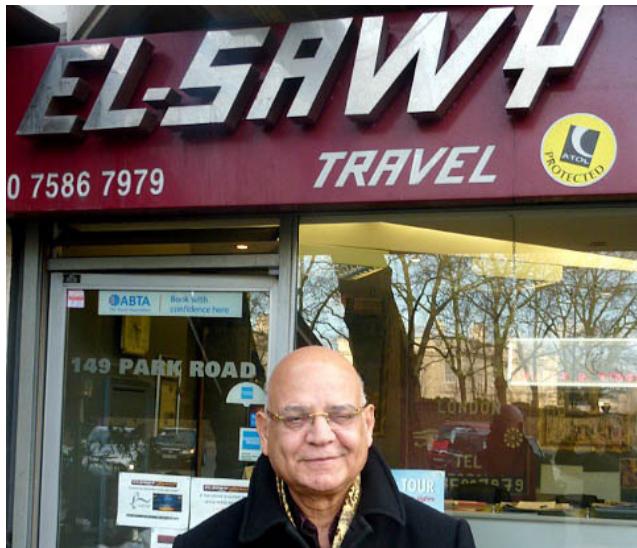
Mutawwifs have a very longstanding tradition of economic independence and it is they who benefit most financially from Hajj. Despite being regulated by the Ministry each Establishment is run by a Board elected from its members. As a private sector organisation rather than a public utility industry, it decides what services to offer Hajj organisers and their pilgrims, as well as how much to charge them.

However, despite not interfering in the business of the Mutawwifs historically, Vision 2030 is being driven by an increasingly centralised form of governance in Saudi Arabia. As compared to slower and more relaxed forms of traditional bureaucracy, which did not always make efficient use of the available technology, there is a new top-down impatience to deliver rapid change in the pilgrimage sector. Business administration has moved online with potential for greater transparency. Continuing improvements in the application of technology are also seen as an important way of meeting market-based and operational challenges. It will be for the Mutawwifs and the Hajj organisers whom they serve to keep pace with these developments as their future under Vision 2030 is unclear.

3. UK Hajj Organisers: From Independent to Package Travel

In the absence of a Muslim state bureaucracy to manage Islamic pilgrimage in the non-Muslim states of the West, it was possible until the early 2000s for pilgrims to organise Hajj entirely independently. Having purchased a flight, one could present a passport at the Saudi Embassy in London, pay the necessary Hajj draft cheques and apply directly for a visa. Some did not arrange accommodation in advance and many Hujjaj from the 1980s and 1990s relate tales of sleeping on the floor on a matt a rickety Makkah hotel without glass windows.

3.1) Independent Hajj Travel



UK licensed Hajj organiser, London, 2014. Seán McLoughlin

Various well-networked and trusted individuals in local communities – religious scholars and imams, redundant textiles workers, converts and student activists - were involved in leading small UK Hajj groups fairly informally at this time. The majority were technically ‘self-employed’ but only a minority probably thought of themselves as running a ‘business’. Some long-established companies retain the names of the founders of particular Hajj groups, e.g. the late Lalla ('Uncle') Abdul Malik from Nottingham, who came to know Saudi students studying in the UK (later Ministry of Hajj officials) when he had a halal meat shop in Birmingham.

Other names are very obviously associated with travel agencies whose principal business was arranging flights to ethnic homelands e.g. Pak Travels, also in Birmingham. But while travel agents did begin to offer commercial Hajj packages during the 1980s and 1990s these were not compulsory. Serving the community around Regent's Park Mosque in London, El-Sawy Travel Limited, lays claim to having been the first travel agency to have formally organised a Hajj tour from the UK in 1981. But in the 1990s, Pak Travels and El-Sawy Travel were among just four current licensed UK Hajj organisers to be incorporated as limited companies.

3.2) Regulating UK Hajj Organisers in Saudi Arabia

However, this ‘independent’ pattern of Hajj-going described above is no longer allowed. During the 2000s the Ministry of Hajj began to introduce a system to regulate private Hajj organisers bringing pilgrims from Western countries. The Minister of Hajj was concerned about tales of people sleeping on the streets on arrival to Makkah. Pilgrims can still book flights to Jeddah or Madinah independently, but since the early 2000s the Hujjaj could only access visas through organisers, who now had to register with Establishment TEAA.

This process involved Hajj organisers presenting UK company documents in Saudi Arabia which in turn drove a spike in such registrations at Companies House. Around 85 per cent of current licensed Hajj organisers, became incorporated in the 2000s, with 59 per cent incorporated in the period of 2000-04 alone. Organisers also had to declare how many pilgrims they took each year and the Ministry of Hajj started to apply fines to those who did not meet this target.

3.3) Hajj Packages

In Britain at least, what this began to institutionalise was an existing semi-formal system, which is still arguably professionalising two decades later (Chapter 9). Even today, around a quarter of Hajj organising businesses are run from residential rather than high street properties. Then, in 2006, the Ministry of Hajj also decreed that pilgrims could only secure their accommodation and visas by purchasing a package from a fully licensed private Hajj organiser (Munazzam). Whatever the number of pilgrims that a Munazzam was taking that year, this would be their official visa allocation in future years.

Shortly afterwards, in 2007-08, the minimum number of pilgrims that a Munazzam could take for Hajj was also raised to 150. This further bid to consolidate the industry did reduce the number of licensed Hajj organisers significantly from around 185 to about half that until new entrants to the market were allowed again for the first time in the mid-2010s. It also prompted the merger of many smaller companies previously taking only around 50 Hujjaj. The official maximum number of visas a Munazzam may usually hold in the UK is 450.



UK licensed Hajj organiser, Birmingham, 2014. Seán McLoughlin

3.4) UK Licensed Hajj Organiser Numbers in a Comparative Perspective

In 2019 there are reported to be 117 Munazzam companies licensed in the UK. According to a previous version of the Ministry of Hajj website, the figure in 2011 was 80 and according to the KSA Embassy in London it was 92 in 2016. Thus, the number of licensed Hajj organisers in the UK has grown by 37 or about 30% during the last decade and 25 or about 20% since Vision 2030 was announced.

These are by far the largest numbers of licensed Hajj organisers among Western countries with similar or larger Muslim populations as a rare, publicly available snapshot from 2015 in Table A shows (courtesy of French Hajj researchers, Drs Jihan Safar and Leila Seurat, L'École des hautes études en sciences sociales, Paris).

Table A: Indicative number of licensed Hajj organisers and visas (Establishment TEAA, 2015) by country and Muslim population in 2011:

Country	Muslim Population 2011	Licensed Organisers 2015	Visas in 2015
UK	2.869M	88	22,768
France	4.704M	40	17,509
US	2.595M	42	12,555
Germany	4.119M	15	7,467

So, in France, despite a larger Muslim population than the UK, in 2015 there were 40 licensed Hajj organisers (latest reports suggest around 65), while in Germany, where the Turkish Embassy and Ministry of Religious Affairs takes an active role in organising Turkish Islam in the diaspora (Laurence 2012), the figure was as low as 15.

As we shall see in the next chapter, the UK Hajj was earlier and better established, so as compared to their European counterparts, perhaps more UK group leaders were in a position to register with the Saudi authorities two decades ago? Indeed, just a handful of companies control the majority of Hajj visas in France with one, well-connected organiser, apparently controlling around 5000.



UK licensed Hajj organiser, Bradford 2014. Seán McLoughlin

3.5) Official Distribution of Visas in the UK

The regional distribution of licensed Hajj organisers in the UK follows the pattern of Muslim population density as an analysis of the 92 companies listed on the UK Saudi Embassy website in 2016 shows:

- 52% in London/the South (13 in East London)
- 27% in the North of England (11 in Bradford)
- 21% in the Midlands (11 in Birmingham)

The 2015 data published online by Establishment TEAA was also analysed to give a snapshot of how official visa numbers were distributed in the UK by the location of Hajj organisers. Again, the clustering of visas in areas of high Muslim population such as East London, Bradford and Birmingham is as expected as Table B shows.

Table B: Distribution of official Hajj visa numbers by licensed Hajj organiser location (TEAA Establishment 2015):

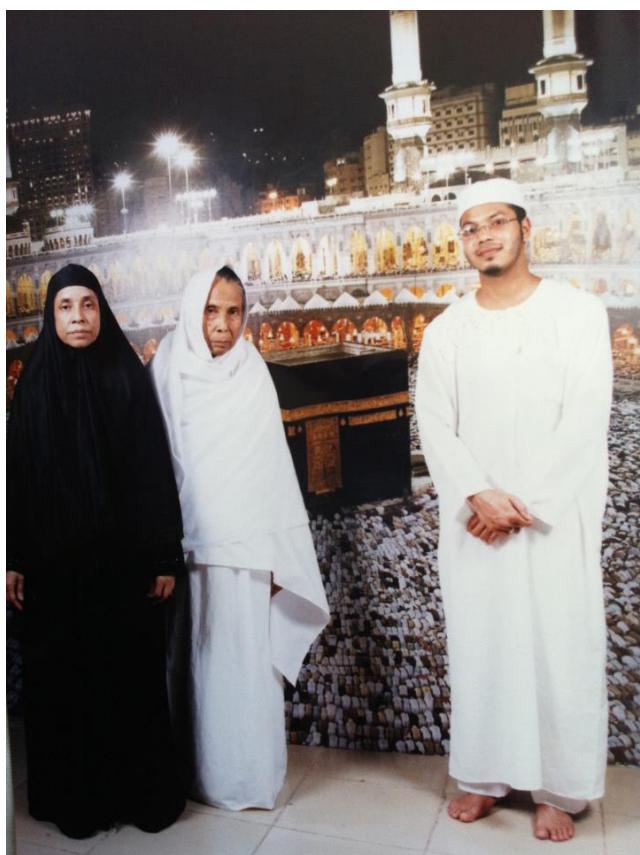
Rank	Region	Official Organiser Visa Tally	Visa Tally by Region
1.	East London	450, 450, 450, 366, 355, 350, 342, 300, 300, 222, 215, 179, 170, 167, 150	4,166
2.	Bradford/ Yorkshire	450, 350, 340, 300, 300, 250, 210, 208, 200, 200, 187, 158, 150, 150	3,453
3.	Blackburn/ Lancashire/ Manchester	450, 450, 396, 395, 332, 299, 250, 200, 190, 180, 160	3,302
4.	Birmingham/ West Midlands	450, 450, 350, 309, 300, 250, 200, 165, 160, 150	2,784
5.	Greater London/ & the South	450, 266, 256, 220, 200, 175, 170, 160, , 160, 155, 155, 150, 150	2,667
6.	West London	450, 400, 350, 332, 230, 200, 151, 150	2,263
7.	East Midlands	316, 295, 192, 165, 150, 150	1,268
8.	North-West London	450, 255, 160, 150	1,015
9.	North London	450, 230, 50	730
10.	South-West London	320, 150	470

This data also identifies a baseline for the general shape of the Hajj visa marketplace in the UK, which could be used to track its changing contours as new entrants are awarded licenses and some organisers have their licences revoked. In 2015 only 12 organisers had the maximum 450 visas, whereas the majority had visa numbers between 151-300.

Tally of UK Licensed Hajj Organisers by Visa Numbers: (Source: TEAA Establishment 2015)

- 12 x UK Hajj organisers having 450 visas
- 16 x UK Hajj organisers having 301-400 visas
- 20 x UK Hajj organisers having 201-300 visas
- 26 x UK Hajj organisers having 151-200 visas
- 12 x UK Hajj organisers having 150 visas

4. British Muslim Pilgrims and UK Hajj Markets



Family portrait, Hajj 2007. Fokhrul Islam.

Expectations of going on the Hajj have been transformed in the diaspora, just as they have become more democratized in terms of social class, gender and generation (McLoughlin 2013a: 244).

4.1) Early UK Hajj Numbers in a Comparative Perspective

Basic data for Hajj-going in the UK is available intermittently going back to the 1960s. The average annual rate of Hajj-going from the UK was just 121 pilgrims during 1961-65 (Bianchi 2004: 279). 84% of all European pilgrims in 1972 were male (Long 1979: 136).

Table C: Average Pilgrimage Rates from Selected Western Countries, 1960s-80s (adapted from Bianchi 2004: 279)

Country	1961-1965	1966-1970	1971-1974	1975-1979	1980-1984	1985-1987
UK	121	833	1385	1706	3292	4482
Netherlands	-	-	-	179	277	540
France	11	168	232	285	261	262
USA	6	15	31	72	150	222
Germany	1	1	1	5	31	46

However, as Table C shows, by 1985-7, a time by which Muslim migrants from South Asia had reunited their families in the UK,

there were 4,482 British Hujjaj. This far outstripped Hajj-going from any other Western country, and perhaps explains why, even today, the UK has so many more Hajj organisers (Chapter 3). In more recent years, the numbers going for Hajj from countries such as France, for instance, have matched those of the UK at around 25,000. But this remains the highest rate of Hajj-going from the West relative to population and in absolute terms.

4.2) Relatively High Hajj Traffic from the West

As noted previously pilgrim numbers from non-Muslim countries in the West are not restricted by the official quota of 1,000 pilgrims per million of total (Muslim) population. For instance, if the Hajj quota for the UK was based on Britain's Muslim population of 2.8 million at the last Census in 2011, it would limit the number of UK pilgrims to just 2-3,000 per year, some 10 times less than current levels. A quota based on the UK's total population would suggest a figure of around 56,000 pilgrims, which has never been approached in terms of demand.

So, Muslim minorities in the West undoubtedly benefit from opportunities to go for Hajj at a time more or less of their choosing, an option largely unavailable to most Muslims worldwide. Though pilgrim numbers cannot be compared to South or South East Asia, the UK figure of around 25-27,000 is actually approaching Muslim-majority countries such as Morocco (31-32,000), which has the 10th highest number of Hujjaj overall.

4.3) Generation M: Income, Mobility and Social Change

Income remains the most significant predictor of who travels for Hajj worldwide today, and as Chapter 6 illustrates the cost of making the pilgrimage has risen rapidly. Thus, in the context of Vision 2030, and the commercialisation of Hajj per se, the Saudi authorities are reported to be very happy with the UK pilgrimage. British Muslims have access to a disposable income which they are happy to spend while in Saudi Arabia too. They behave themselves and depart the Kingdom on time.

So, while Muslims still often exhibit amongst the highest levels of relative deprivation in the UK, international labour migration is still a marker of relative prosperity. Social mobility among post-migration generations is far from universal but it has been on the rise for some decades amongst a continually growing 'new' middle class of young, educated, media-savvy, professional Muslims. Shelina Janmohamed (2016) now speaks of 'Generation M'.

Impact of Migration on Hajj-going (Source: University of Leeds survey of 213 British Hujjaj, 2011-14)

- 35% had grandparents who had been for Hajj
- 80% had parents (the 'migrant' generation) who had been for Hajj
- 91% had always anticipated making the pilgrimage themselves

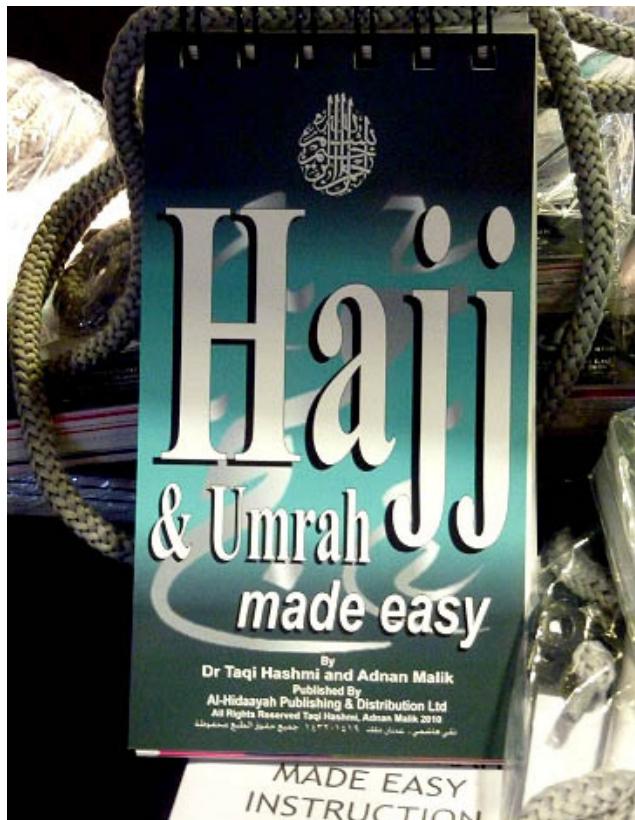
Of course, according to Islamic law, being physically able and having the necessary financial resources makes the Hajj incumbent upon Muslims at least in terms of religious norms. So, while Hajj was once almost exclusively an opportunity for

older people to prepare to face al-Akhira (the Afterlife) having been purified, pilgrims in the West are also often younger than those in the rest of the Muslim world.

Factors Determining Hajj-going (Source: University of Leeds survey of 213 British Hajjaj, 2011-14)

- 'Religious duty' (53%)
- 'Personal need or spiritual journey' (30%)
- 'Other' (finances, community expectation, support to a family member, freedom from family responsibilities, time off work) (16%)

Generation M and its antecedents are more conscious than ever before of religious orthodoxy. The more religious among them emphasise the impact of Hajj on one's character in the here and now. Indeed, some young British Muslims are choosing to mark their marriage as a significant rite of passage by going on Hajj together. Moreover, ties to parents' and grand-parents' ethnic homelands in South Asia and elsewhere are generally weakening among the third generation. Instead, faith, culture and identity-related pilgrimage and tourism has become a key motivation for visits to the wider Muslim world, including Spain, Morocco and Turkey, as well as Egypt, Palestine and Iraq.



Al-Hidaayah bookstore, Birmingham, 2014. Seán McLoughlin.

4.4) Economy, Premium and Mid-Range Packages

UK licensed Hajj organiser -

Affluence plays a big role in the way the packages are sold.

While common structures shape the UK Hajj market overall, quite different types of organiser and package have historically served distinctive economy and premium segments, each with its own cultural and economic logic. Of course, there is diversity within each segment and during the last decade especially there has been a dynamic crossover between them as the available services and pilgrims' expectations have changed. An expanding mid-range segment is probably where most of the business lies now.

UK licensed Hajj organiser -

Ethnicity or even kin and village-based loyalties ...

[There is] a lot of competition in this segment ...

Those things still matter in certain marketplaces.

Historically, the largest UK Hajj markets have been rooted in the particular ethnic (e.g. Pakistani, Gujarati, Bengali) and denominational networks of working-class post-migration British Muslim communities. Such influences reflect the way Hajj-going was organised before commercial Hajj packages became compulsory, but buying and selling in this marketplace is still often conducted on quite an informal basis. It is closely linked to personal relationships with local imams and extended family members. Even today the attitude that "I have to go with that group or this scholar" is much in evidence. Thus most Hajj organisers or their agents in this sector have tended to serve pilgrims from their own ethnic backgrounds. Transactions have also often been cash-based, something not untypical of post-migrant economies more generally even today.

These more 'traditional' Hajj market segments remain very sensitive to price too. Thus, the facilities and services offered have typically been 'no frills', with the best of this 'nice enough, clean enough' and the worst falling far below this standard.

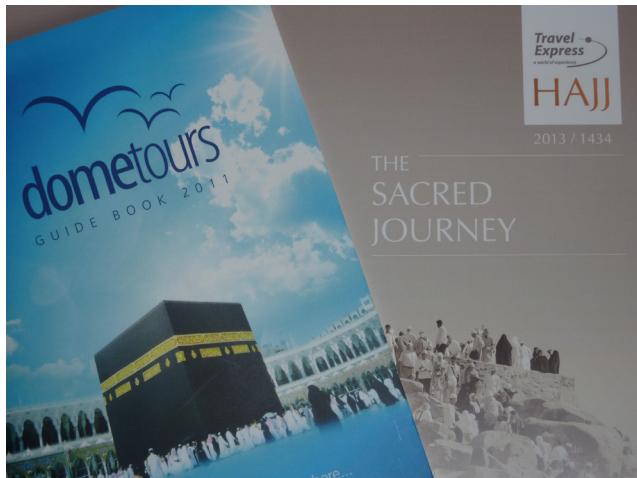
Pilgrims of the past seemed more accepting of the hardships associated with Hajj, as well as the unsympathetic attitude of some Hajj organisers: "This is what you are going to get. Take it or leave it". While some in this marketplace won well-deserved reputations for well-regimented tours, others cut corners and badly let their clients down. Still, a key concern for many older pilgrims historically has been the use of mother-tongue languages and provision of 'desi khana' (home-style South Asian cooking).

UK governance officer -

At the Hilton Hotel in Makkah, a quarter of their rooms are said to be sold to British Hajjis.

Since around 2000 'premium' Hajj packages have also been targeted at the growing middle-class of British Muslim professionals and their families. Pioneered by the educated, Islamically-serious second generation, entrepreneurs in this segment saw the potential of 4-5* packages which made Hajj 'easier'. They created significantly more expensive packages which allowed pilgrims to focus on worship during a more

comfortable and typically much shorter ‘express’ trip. As one such company assures its multi-ethnic, multi-denominational Hajjaj, “We will worry about your Hajj more than you will”. Preparatory materials, seminars and guiding are all well-resourced and English-language based.



Hajj brochures from the early 2010s, Seán McLoughlin, 2014.

Such packages, which in 2019 range from £6,500-£11,500, mimic the sophistication of a professional ‘mainstream’ holiday in terms of a smart high street presence, fully-documented itineraries and brochures and websites, at once appealing to the consumer as an individual but also providing the reassurance of well-organised formality. Some companies have developed very strong reputations and brand loyalty, with intending pilgrims waiting, if necessary, to travel with them. Interestingly, though, even in this segment there is a reluctance to make final bookings online.

UK licensed Hajj organiser -

It used to be that case that you could count those organisers offering 5 Hajj packages on one hand.*

Like British Muslim communities per se, the UK Hajj marketplace is of course evolving. During the last two decades the middle segment has grown especially. The bottom end of the economy market, which may once have satisfied some of the older generation, is diminishing. Fewer people are looking for the basics. The demolition of older hotels in close proximity to Masjid al-Haram means that going more upmarket than in the past is the only option. Still, there are many differences in the configuration of mid-range packages designed to match consumers’ desire for ‘a little bit of luxury’ e.g. by travelling earlier or taking an indirect flight to reduce airfares and/or staying at a nice hotel but only outside the main Hajj period as part of ‘shifting’ packages. Yet, as we shall see in Chapter 7, issues can arise if packages are not marketed accurately.

4.5) Hajj-Going from Britain in the Future?

Saudi strategy is focused on doubling the size of Hajj numbers globally. Muslim populations in the West are still growing too, mainly because of existing fertility levels as well as new immigration. Indeed, the Pew Forum (2017) expects the Muslim population of the UK to reach 5.567 million by 2030. Interestingly, at 8.2% of UK population, that is around double its size at the last Census in 2011. However, even assuming more visas are granted (which seems logical given Vision 2030 targets and such population growth) and that they become

easier to access directly too, e.g. through electronic booking systems, is it possible that demand may not meet supply without new interventions in the market?

One licensed Hajj organiser commented at a trade association gathering in 2018 that the ‘backlog’ for performing Hajj among the older generation is rapidly being cleared: “Everyone is a Hajji now”. There has also been a longstanding ‘no return within five years’ rule which, admittedly, has not always been enforced. Moreover, as we shall see in the next chapter, the base costs in a Hajj package have become very high.



2019 Hajj social media advertisement, @Passport2Hajj via Facebook.

4.6) Growth in Visas Versus Growth in Population?

While there is no textbook answer here, and demand in different market segments and for different companies has its own dynamics, the numbers do require further commentary. In 2005-09, for instance, the number of visas available to British Muslims averaged around 23,000. Between 2013-16 a 20% cut was applied to all visa allocations worldwide as the Saudi authorities further developed their infrastructure, temporarily restricting the supply of Hajj to pilgrims. In any case, the number of UK Hajj visas is variously reported now to be around the 25-27,000 mark. But this represents only around 10-15% growth during the last decade.

There will not be another Census in the UK until 2021. However, the Pew Forum (2017) estimates that in 2016 the Muslim population of Britain was around 4.130 million. Thus, even since 2011, when the Muslim population of Britain was measured at 2.869 million, this represents growth of 30%. So, while according to my calculations the rate of UK Hajj-going outstripped UK Muslim population growth from the 1960s until the 2000s, since then the reverse would appear to be true. In theory at least, demand is most likely to exceed supply, especially given the consciousness of Islamic obligations among Generation M.



Hajj souvenirs, British Museum 2012

5. British Muslim Organisations and the UK Government

Following the Rushdie Affair in 1989, the late Dr Syed Aziz Pasha of the Union of Muslim Organizations, UK and Eire, a Muslim umbrella organisation founded in 1970, called upon the Foreign and Commonwealth Office (FCO) to consider a UK Hajj mission. However, there was no interest from a Conservative government, which showed little appetite for the public recognition of Islam in the UK. When New Labour came to power in 1997, it was more dependent on Muslim votes in the inner-cities. In this context, there was greater openness to Muslim lobbies, including those seeking to address the welfare of British pilgrims while performing Hajj in Saudi Arabia.

5.1) The Association of British Hajjaj



ABH committee members after meeting with FCO at which a British Hajj Delegation was agreed, 1999.

The Association of British Hajjaj (ABH, <https://www.abhuk.com/>) is a registered charity based in Birmingham. Formed in response to the various Hajj disasters of the 1990s, the ABH chairman told me in 2011 how, immediately after the great 1997 tent fire at Mina, which killed over 300 pilgrims and injured many more, he had been unable to determine the fate of various family members. On other occasions, too, local people had been unable to access help from the UK consulate in Jeddah when affected by thefts or deaths in Makkah. Apparently the FCO was unsure of how many British citizens were performing Hajj in 1997 because many held dual nationality (British Muslims Monthly Survey, April 1997).

Thus, various businessmen and professionals in Birmingham, together with a number of senior Muslim medical doctors and religious scholars, decided to establish the ABH. Its objectives were twofold: i) to persuade the British government to better support its citizens on Hajj and Umrah as they would during any overseas travel, and ii) to educate British Muslims about health and safety matters in preparing to make their pilgrimage.

5.2) A British Hajj Delegation

Together with Baron Nazir Ahmed of Rotherham, the Labour councillor raised as one of the first Muslim life peers in 1998, the ABH convinced the FCO that there was diplomatic advantage both at home and abroad in the UK being the first non-Muslim government in the West to establish a Hajj delegation (Independent on Sunday, 17 October 1999). However, while Lord Ahmed lead the first delegation in 2000, the FCO decided that thereafter he would do so alongside

Muslim Council of Britain (MCB, established 1997) general secretary, (now Sir) Iqbal Sacranie.



First UK medical Hajj mission, 2000.

At the time, the MCB was privileged by New Labour as its main British Muslim interlocutor. However, having expected to be the FCO's main partner itself, ABH complained that the British Hajj Delegation (BHD) initiative was 'hijacked' and 'politicised' by MCB affiliates. When Lord Ahmed eventually resigned his role, it was a member of the MCB's Board of Counsellors, and another new Labour peer, the late Lord Adam Patel of Blackburn, who subsequently led the BHD from 2001, the year in which MP for Blackburn, Jack Straw, became Foreign Secretary. There was no ABH representation on the delegation thereafter and, interestingly, since it fell out of favour with government in the mid-2000s, MCB has generally kept its distance from Hajj-related matters too.

5.3) Medical Support and Diplomacy

Between 2000 and 2009 the BHD included eight or nine volunteer British Muslim doctors, including eventually one or two female doctors, as well as a chief medical adviser. Basing themselves at a Makkah hotel, all were English-speaking. They saw thousands of patients and offered a visiting service to those pilgrims too ill to attend their clinic (Asian Image, 11 October 2010). The doctors were joined in Makkah by a counsellor and FCO staff from the UK's consulate in Jeddah. Pilgrims no longer had to journey there to access consular services.

While the core concern of the BHD was medical, it also had a diplomatic function. In its heyday, Foreign Secretary Straw launched the delegation annually in partnership with Lord Patel, who was seen as the representative of British Muslim pilgrims. In the company of various ambassadors and diplomats, an event was hosted at the symbolic home of the wider Muslim world in the UK, the Saudi-funded Regent's Park Islamic Cultural Centre, ICC, (<http://www.iccuk.org/>). Once in Saudi Arabia, Lord Patel joined other dignitaries at official events marking the annual pilgrimage.

5.4) Hajj Advisory Group and Health Awareness

While the BHD medics funded their own locum cover, back in the UK the government was forced to defend criticism of the cost of the BHD, which had reached £110,000 by 2009 (Asian Image, 11 October 2010). The pilgrimages of other faiths were not supported in the same way. A Hajj Advisory Group, including

MCB, ABH and others, with the ICC as the secretariat, had been established in 2001-02 to encourage British Muslims to privately support the BHD, which cost less than £5 per pilgrim. However, such finance was not generally forthcoming.



Lord Adam Patel representing the British Hajj Delegation at the Foreign and Commonwealth Office, London, 2008.

Despite being marginalised from the diplomatic and medical delegation, the ABH secured small pots of state and private funding to deliver Hajj-related health and safety messages during this period. It raised awareness of the rare W135 strain of meningitis and new Ministry of Hajj immunisation requirements for pilgrims. ABH also joined with politicians to host annual Hajj-related events at the House of Lords and pre-Hajj camps and seminars in Bradford, Manchester and Glasgow, as well as Birmingham and London. Its officers made contributions in the British Pakistani press and media which were picked up internationally. However, a lack of funds and second generation volunteers now means that ABH's work is currently confined to website and Facebook announcements.

5.5) The Council of British Hajjis

If the ABH is rooted in mainly British Pakistani networks, the Bolton-based Council of British Hajjis (CBHUK, <http://cbhuk.org>), which was formed in 2006, had Lord Patel as its founding patron, and so emerged from British Gujarati networks. As the BHD was not that well-known at home, CBHUK initially sought to promote health at Hajj matters in the UK. Having witnessed the challenges of performing Hajj himself in 2005, and having then attended a MCB seminar during 2006, CBHUK's CEO, an IT/communications professional and business-owner from the second generation, wondered why so many British Muslim pilgrims still knew so little about the practicalities of going for Hajj.

Since holding their own first seminar in Bolton during 2006, CBHUK has mobilised a national network of medical and non-medical volunteers and sponsors to deliver community-based vaccination clinics and English-language Hajj preparation events. Like ABH it also runs a website devoted to various aspects of Hajj news and advice. However the CBHUK website is more forward in soliciting donations, also runs an online shop and includes information about licensed organisers.

Indeed, in the 2000s, ABH and CBHUK can be seen as doing similar Hajj awareness work, which as we shall see in later chapters, also extended to lobbying UK governance authorities on Hajj-related fraud. However, into the 2010s, political, generational and other factors have influenced the ability of all charities to advance their respective causes.

Following the global financial crisis in 2008 and a subsequent emphasis on a 'small state' in British politics, ABH and CBHUK have differed significantly in terms of their expectations of government intervention, as well as their attitudes to collaborating with licensed Hajj organisers and the wider pilgrimage business sector per se. I will say more in this regard concerning CBHUK's trajectory during the last decade in Chapters 8 and 9.

Council of British Hajjis' Seminar publicity, 2018.

5.6) A Consular Delegation Only

During 2010 the new UK Conservative-Liberal Democrat coalition government withdrew its support for the British Hajj Delegation (BHD) medical team (Asian Image, 11 October 2010). It was argued that there had been a significant improvement in Saudi medical facilities, which are free of charge to all pilgrims, and a related drop in demand for BHD services, although this view was contested.

While British Muslim organisations no longer had the ear of government, in 2011 a British Hajj Consular Delegation was symbolically launched by Baroness Sayeeda Warsi, the first Muslim female member of the Cabinet, alongside the FCO and the Saudi Ambassador to the UK. However, pilgrims were mainly urged to heed FCO advice and take responsibility for their own pre-travel preparations.



British Hajj Consular Delegation launch 2011, London. Open Government Licence 1.0.

Today, the FCO still provides consular support to UK pilgrims, including 24/7 telephone hotlines and there is an on the ground presence of consular staff from Jeddah in Mina as well as Makkah. However, the FCO's overall emphasis remains on planning and prevention (<https://www.gov.uk/foreign-travel-advice/saudi-arabia/pilgrimage>). It is trying to be more proactive in terms of working with key stakeholders to push out key messages to pilgrims before they travel. The Jeddah consulate team travels to London to meet strategic partners before Hajj. They also promote a social media campaign. However, overall, on the ground challenges are seen as manageable. If there is a major incident during Hajj the response will be co-ordinated from Jeddah, drawing upon a wider network of FCO support within the region.

5.7) The BHD as a Private Charitable Initiative

On 29 September 2012 the BHD (<http://www.britishhajjdelegation.org.uk/>) was re-launched as a private charitable initiative by Lord Patel at the ICC. Since then its second generation leadership has passed to the medical doctors themselves. Its officers still hail mainly from the North-West of England but they emphasise that the BHD is now "a very different entity" than before. They stress their professional credentials and the spirit of religiously-inspired volunteering, which they seek to set apart from business and politics. Despite the common roots of the two organisations under Lord Patel's mentorship, and CBHUK being invited to join the BHD in 2012 and 2013, the BHD also increasingly stresses its distinctiveness from CBHUK and vice versa.

It is estimated that perhaps only 60% of Hajj organisers hold pre-Hajj seminars and only a quarter to a third take a doctor to Makkah as part of their team. So, there remains a significant task for all stakeholders in better preparing pilgrims for the health and safety, as well as the ritual, aspects of Hajj. British Muslim charities with an interest in health at Hajj such as the BHD, CBHUK and ABH could all explore with licensed Hajj organisers and bodies such as Public Health England whether there is benefit in co-ordinating scaled-up activity in this regard. As a group of medical professionals the BHD also aspires to develop a Hajj-related health research agenda.

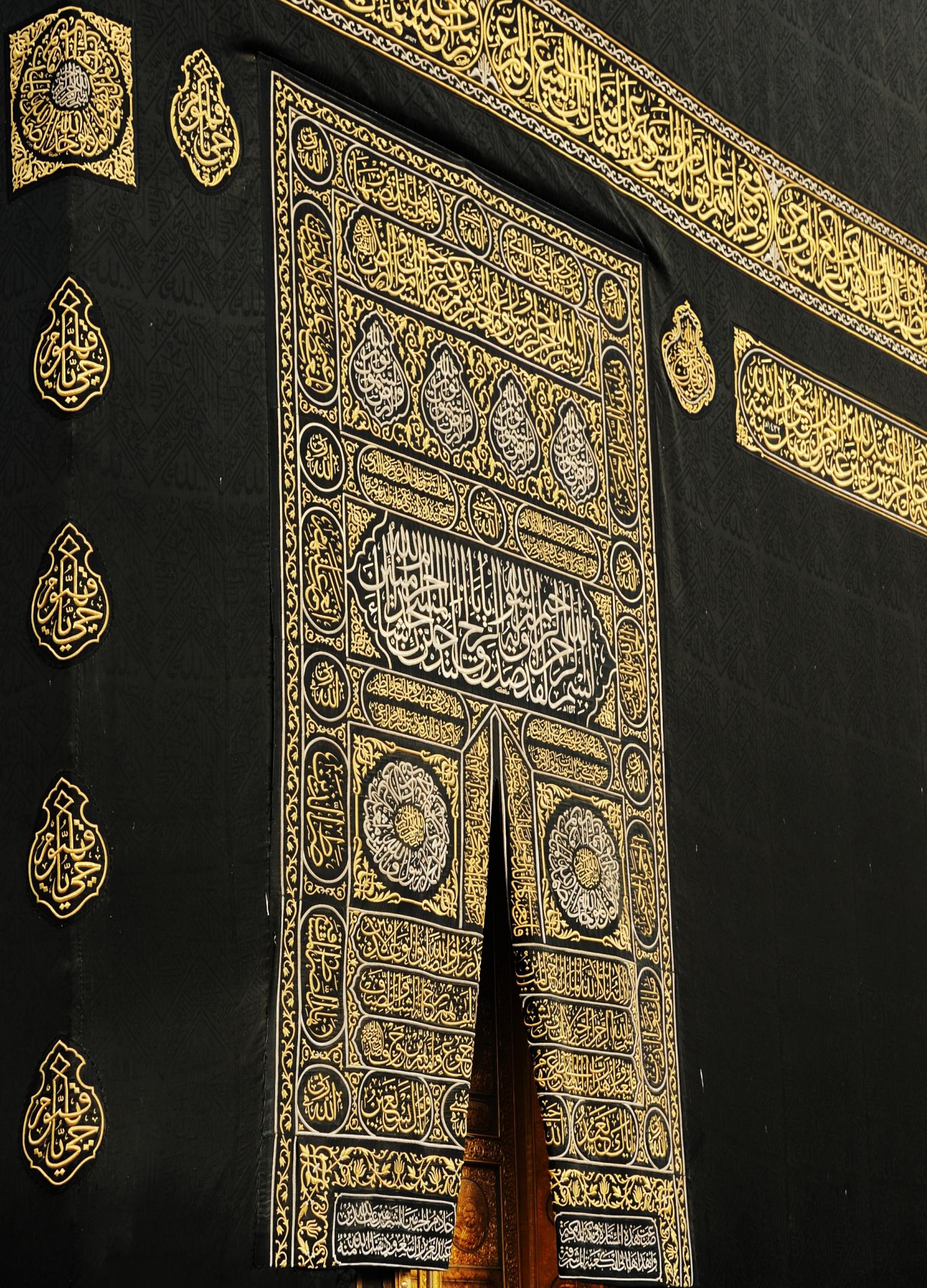


British Hajj Delegation, Burj al-Sultan Hotel base, Makkah 2017.

5.8) The Future of UK Hajj Charities in Saudi Arabia?

In terms of an on the ground presence in Makkah, the BHD still aims to deliver English-language-based continuity of care to hundreds if not thousands of UK pilgrims familiar with the culture of the National Health Service. However, the doctors now pay not only for their own locum cover, but also their flights, accommodation and transport. UK-branded medications donated by a British Muslim pharmacist and basic equipment are carried as part of their normal luggage allowance. The only thing the BHD's donations actually pays for is a clinic room in a Makkah hotel.

Despite help at different points from the ICC, some licensed Hajj organisers and CBHUK, which now operates independently in Saudi Arabia, it was not possible for the doctors to attend Hajj in 2018. Letters of support from the FCO or Hajj visas have not always been forthcoming. Moreover, late confirmations have meant that time on the ground has sometimes been restricted. Therefore, in 2019 the BHD doctors are self-funding packages including visas with a licensed Hajj organiser. This approach means that they can advertise their presence more reliably to pilgrims. However, the future of overseas volunteers during Hajj is unclear. The medical teams of other European nations have withdrawn and, as well as liaising between pilgrims, organisers and the consulate, CBHUK is networking with local health partners such as the Saudi Medical Academy for Volunteering.



6. Why is the Cost of UK Hajj Packages Rising?



Royal Clock Tower, Abraj al-Bayt hotel and mall complex, Makkah

Licensed UK Hajj organiser -

Makkah's prices are driven by the global market.

Licensed UK Hajj organiser -

Anybody who denies the fact that Hajj has become commercialised you're living in a time-warp.

Hajj has always had a commercial dimension with the private sector in Makkah charging “what the traffic would bear” (Long 1979: 35). Yet, there is a widespread perception that Hajj is becoming very expensive and even whispers in British Muslim communities about price-fixing. Therefore I made use of information publicly available online to try and track indicative Hajj package prices in recent years. In this regard Hajj organiser websites are useful because they include information about the changing cost and configuration of Hajj packages. So, in 2013-14, and then again in 2017-18, I visited the website of each UK licensed Hajj organiser based on lists published intermittently online by the Embassy of Saudi Arabia in London.

For each website I sought to record the price of one or more Hajj packages advertised if available. In 2014, 51 of 79 organisers (representing a sample of about 65%) presented a price for one or more Hajj 2013 or Hajj 2014 packages. In 2017-18 the figure was 50 of 92 licensed Hajj organisers (representing a sample of about 54%). Four companies which were unusual in quoting a price for packages not including flights were excluded from the samples. Thus the samples were 47 (2013-14) and 46 (2017-18) organisers respectively which is an acceptable proportion.

6.1) The Highest Package Prices

The mean average highest package price in 2013-14 was £4472, while in 2017-18 it was £5934. This represents a 25 per cent rise.

In terms of the highest package prices offered by licensed Hajj organisers across 2013-14, Table D shows the following results, with nearly half of all packages sampled costing less than £4000 and only 10% costing £6000+:

Table D: Highest package prices, 2013-14

Package Price	Percentage	No. in Sample
£6000+	10%	5
£5000+	23%	11
£4-5000	35%	13
£4000 or less	49%	18

By 2017-18, Table E shows that the number of licensed Hajj organisers advertising a highest package price in excess of £5000 had trebled to 71%, while those advertising a highest price of £6000+ had also nearly trebled to 30%.

Table E: Highest package prices, 2017-18

Package Price	Percentage	No. in Sample
£6000+	30%	14
£5000+	71%	34

Interestingly, the number of licensed Hajj organisers advertising all of their packages in excess of £5000 remained consistent between 2013-14 and 2017-18 at just two (4%). Both companies concerned are based in the north London area.

6.2) The Lowest Package Prices

The mean average lowest price was £3727 in 2013-14 but £4835 in 2017-18. This represents a 23 per cent rise.

In terms of the lowest package prices offered by licensed Hajj organisers across 2013-14, Table F shows that nearly three-quarters of all packages cost between £3000-3999:

Table F: Lowest package prices, 2013-14

Package Price	Percentage	No. in Sample
£5000-5999	4%	2
£4000-4999	13%	6
£3000-3999	74%	35
£2000-2999	11%	5

In contrast, as Table G shows, by 2017-18 there were no licensed Hajj organisers advertising a Hajj package price below £2000-2999, while those advertising a lowest price of £3000-3999 had shrunk from 35 to 4 (or 74% to 9%). Many more organisers were now offering packages at £4000-4999 (26 or 57%) and to a lesser extent £5000-5999 (15 or 33%). Thus, what British Hujjaj can expect to pay for an economy package has risen quite noticeably in the space of just a few years.

Table G: Lowest package prices, 2017-18

Package Price	Percentage	No. in Sample
£5000-5999	33%	15
£4000-4999	57%	26
£3000-3999	9%	4

6.3) So, why is the cost of Hajj rising so much?

Licensed UK Hajj organiser -

Someone from the outside might think “That's extortionate!” but without knowing the costs involved.

UK Muslim community association -

If there was something out there explaining this to the community it would help and go a long way ... You [Hajj organisers] need to do this to educate the community

According to UK Hajj organisers there are several different reasons why Hajj has become so expensive. A popular perception is that Hajj organisers are profiteering. Sometimes lucrative profits can be made but year-to-year organising Hajj is also an especially risky business, more so than in the UK travel and tourism sector per se where payments are often made after holidaymakers return home. In contrast, Munazzams pay hundreds of thousands of pounds or more around 3 months in advance for components of their package before Hajj visas are even released to them in Saudi Arabia.

Many are wary of reducing the quality of their service. But there are others, undoubtedly, who cut corners in an effort to both remain competitive and preserve their profits. One organiser expects prices to plateau once the Saudis have completed the modernisation of their facilities, although this may be an ongoing process.

Another suggestion by a representative of a Muslim community association was that a fuller breakdown of costs should be provided by Hajj organisers. While this is not attempted here, it is possible to report on Hajj organisers' comments about various factors impacting the rising price of Hajj packages in the UK.

UK Muslim community association -

There's another misconception amongst the consumers ... I think that's something you guys [Munazzams] need to overcome by giving the breakdown of the cost associated with Hajj

6.4) Brexit



Licensed UK Hajj organiser -
Brexit has absolutely killed us.

The drop in the value of the Pound from around 6 to around 4.5 Riyals since 2016 has been key. At the time, some Hajj organisers broke even, others could not cover their costs. It was the same in 2008 during the global financial crisis. One organiser reported being £300,000 in debt at that time. Most buy currency only as and when they need it but it is possible to fix rates for a 5% deposit, though some are not clear that this is allowed Islamically.

This weakness in the Pound can be compared unfavourably with the stability in the American Hajj market where the exchange rate between the Dollar and Riyal is fixed. At least one UK organiser had not released his package in March 2019 because of the turbulence in the marketplace. He reported that those selling economy packages at £4600 earlier in the cycle had now raised their prices to £5200-5300.

6.5) Air Fares

Licensed UK Hajj organiser -

We're not sat here not doing anything. We are trying our best but we have our limitations.

The cost of a direct flight from the UK to Jeddah is currently around £1400 in 2019 and an indirect flight around £1100. This is a simple case of supply and demand with flight dates the same for all Hujjaj worldwide. A particular issue at present is that Hajj falls during the northern hemisphere summer. Indeed, some airlines do not want Hajj organisers' business or only make limited seats available to them because they are more focused on serving a holiday market including returning overseas students. This market is more of a priority for airlines as, unlike Hajj, which moves back through the Islamic lunar calendar each year, it will still be there in several years' time.

Hajj flights also go out full and come back empty, which means extra costs for airlines in terms of fuel. A number of licensed organisers have experimented with charter flights since the 2000s at half the price of Saudia airlines apparently. But there are specific operational challenges including access to landing slots. Ultimately, pilgrims also want – and to some extent are willing to pay for - the convenience of direct flights from/to the UK to/from Jeddah and Madinah.

6.6) Accommodation

Licensed UK Hajj organiser -

In my heart I am not happy about the money we are paying ... We have to educate the market ... it doesn't have to be super five stars.

Licensed UK Hajj organiser -

The Holiday Inn concept would be fine but there's no such concept there.

There is also low supply and high demand for accommodation due to the demolition of older, cheaper hotels in Makkah that many UK organisers have made use of hitherto. The hotels being built near Masjid al-Haram are mostly 5*. International hotel chains have realised the value of the captive Hajj market and now lease 50% plus of these new hotels. The Clock Tower building above the Great Mosque in Makkah is 90% owned by Accor Hotels of France. International brands charge international prices. In the past there may have been more flexibility or discounts.

One Hajj organiser released a statement on their website in an effort to explain the current price of Hajj. They reported being met with some incredulity by a customer but gave him the example of how exchange rates impacted the price of a double room at the Fairmont hotel across 2018 and 2019. The difference in the cost for the same room was £2000.

6.7) New Taxes and an End to Subsidies

Licensed UK Hajj organiser -

They are driven by numbers that they have to achieve.

Licensed UK Hajj organiser -

Nothing's free. Everything, we got to pay.

Marketisation and efforts to boost non-oil income have seen a fundamental change in attitude to the provision of services in Saudi Arabia. In contrast to the tax-free regime of the past, everything now has to be paid for and increased costs are mounting up. In 2018 VAT at 5% was introduced on almost all goods and services and a municipal tax of 5% has meant a rise in the cost of hotels (Saudi Gazette 14 February 2018).

There have been reductions in state subsidies for water, electricity and fuel that has led to an increase in the cost of goods and services per se. Also, Hajj organisers report late changes to costs even after the price of packages has been released in the UK. So there is always a level of uncertainty. And because Saudi Arabia is scrutinising money laundering too, some UK organisers have hundreds of thousands of pounds of funds stuck in banks there while new checks are made.

6.8) Hajj Services

Licensed UK Hajj organiser -

It's not the authorities, its private enterprise but people don't necessarily comprehend that.

Licensed UK Hajj organiser -

Suddenly we get a letter, 'We've increased this price'.



Hajj tents for pilgrims at Mina, outside Makkah

Additionally, the cost of Hajj-related services provided by very profitable Mutawwif companies has risen. These services include transport, tents and other facilities in Mina, including food. While some Saudi licensed Hajj organisers recall charges being as little as £50 per pilgrim in the past, they are now around £700-900 per pilgrim. Another organiser paid 1029 Riyals for services in Mina three years ago but now pays 5600 Riyals, though the Ministry of Hajj claims that various price points for such services are available.

In comparison, it was reported that the Establishment for South Asia charges only 3950 Riyals for its top VIP package. Overall, the main explanation given for the rise in prices is the modernisation of facilities e.g. all tents in Mina now have air-conditioning as standard at a cost of £125-150 per pilgrim per day. Hajj organisers worry that they pay higher fees than Muslim nations with a Hajj mission to negotiate on their behalf. They cannot always control the quality of services for which they are ultimately liable under UK law.

6.9) Saudization of the Workforce

Employment costs are rising too. A policy of Saudi-izing the workforce, which sets targets for businesses in this regard, has been in place for some time. It means that labour is more expensive than hitherto because fewer expatriates and immigrants are being employed.



Shops in Makkah during Hajj, Qaisra Khan, 2010.

The cost of taking experienced Hajj group leaders from the UK to Saudi Arabia has also become more expensive because of a 2000 Riyal (around £400-450) fee for repeating Hajj within 5 years. No exception is made for Hajj guides. The alternative for organisers is taking Hajj guides with less or no experience. 1 visa for staff is allowed for every 50 pilgrims but many companies take more help than this. A top UK company takes 20 UK team members to Hajj and is joined by 15 more from Saudi Arabia.

6.10) Commercialisation of Hajj in the UK

UK governance officer -

From what I have heard from the Saudis, it is the Brits at your end who are piling on the margins.

It would be surprising of course if, as their businesses have become more professionalised and their working environments more commercialised, UK Hajj organisers and their agents have not taken an increasingly business-like approach to their own costs and margins too. The reality is that all concerned are most likely taking their percentage along the way, with generally comfortable profit margins despite ups and downs in the market.

It is unclear what could drive change in this regard. The Saudi authorities have opened up the UK market to new Hajj organisers. We have also seen that there are already more Munazzams in the UK than in any other Western market. So, in theory, there is more competition here than, say, in France and no monopoly, although more research is needed on the dynamics of supply and demand in particular market segments.

7. What Factors Contribute to Hajj-Related Fraud in the UK?

UK Muslim community association -

"How does the industry look to the grassroots?". I think it is very confusing.

UK Muslim community association -

They took him [the travel agent] to court and there were loads [of costs] in legal fees ... but none of the pilgrims got a penny ... It's about making money, misleading people ... We need to come together, up the ante and then say, "This isn't acceptable".

Licensed Hajj organiser UK -

They [some pilgrim welfare organisations] think every tour operator's just a rip-off merchant. It just tarnishes us all.

7.1) ABH Petition



ABH Hajj seminar in Birmingham attended by the city's Lord Mayor, 2014. Seán McLoughlin.

In 2007, the Association of British Hajjaj (ABH) sent a petition with 5,000 signatures to various government departments and parliamentarians in the House of Commons and the House of Lords. The petition complained about the "extreme hardship" and "mental anguish" experienced by vulnerable British citizens at the exploitative hands of some Hajj and Umrah organisers and travel agents.

As well as failing to deliver the services promised, other issues raised included the following: agents blacklisted by the Saudi authorities continuing to take money dishonestly and abandoning pilgrims without documentation; authorised agents charged extortionate prices for visas (up to £1000) that are supposed to be free; as well as general profiteering on organising travel.

ABH charged that such agents, alleged to be unprofessional and often opportunistic one-man businesses, must be investigated more robustly by the authorities and held more accountable to the rule of law so as to protect the rights of innocent British citizens (Chapter 8).

7.2) Under-Reporting and a Lack of Complaints

Historically, limited complaints about Hajj-related fraud have come to the attention of the UK authorities. Pilgrims are sometimes wary of reporting on fellow Muslims or "bringing a bad name" to the community or even a family member acting as a sub-agent or tout for a Hajj organiser. A traditional attitude may also persist that, having become "pure" as a Hajji, one does not speak of such worldly things. In this regard, some Hajj organisers have apparently been quick to exploit the idea that pilgrimage "is not a holiday". They have told pilgrims that, despite the high prices they are paying, complaining might void the religious merit gained by performing their Hajj.

UK Muslim community association -

They complain to me but they will not go to trading standards

The older generation were also less likely to think of themselves as consumers and had probably never heard of the 1992 Package Travel Regulations (PTRs, see Chapter 8). While this is beginning to change, and some Hajj organisers now complain of a compensation culture among pilgrims, even in the age of the iPhone, there remain some practical issues too around gathering evidence of being defrauded. Among 'harder to reach' minority ethnic working-class communities especially there may also be a reluctance to engage the institutions of wider society such as the police, courts and trading standards. For example, when in 2009, an East London agent disappeared with hundreds of passports only 34 pilgrims – less than 10 per cent – reported the fraud.

UK pilgrim welfare organisation -

Mostly they [pilgrims] have got no educational background. They cannot go on the website ... they can't write their complaints ... We help them.

While the lack of complaints about Hajj-related fraud also means that it is still unclear precisely how big the problem is, the authorities have questioned why the issue only really came to the fore in the 2000s. It may be that there is a link to the greater commercialisation and regulation of Hajj packages in Saudi Arabia during this period (Chapters 2 and 3), with more would-be organisers and agents wanting a 'piece' of an expanding and more lucrative yet increasingly closed market.



Hajj pilgrims from the UK © Qaisra Khan, 2010. Creative Commons licence - "CC-BY"

7.3) Unofficial Circulation of Hajj Visas in the UK

UK Muslim community association -

"Who have I bought this package from?" When I get to Saudi I find there's another name [Hajj organiser] that's involved.

The selling and buying of Hajj visas is officially prohibited by the Ministry of Hajj, and many UK licensed organisers are content with their visa allocation. However, few Munazzams can sell all their visas directly. A former licensed Hajj organiser claims that the number that are self-sufficient in this regard is as low as 10, with the percentage of visas in the market actually sold by Munazzams being smaller than one might expect. Year-to-year, probably a majority sell on some, or even all, of their allocation to other Munazzams or sub-agents, though they must still travel to Saudi Arabia to show their face at the appropriate times.

Former UK licensed Hajj organiser -

Now X, when he goes to Hajj with his group, he takes two flags; one is X's own flag, one is Y's [the Munazzam's] flag. He raises the Munazzam's flag only at the Tawafa Establishment. Everywhere else, right under the nose of the Mutawwif ... it's separate.

Depending on their market position and other circumstances, some licensed Hajj organisers may feel under intense pressure to sell on a portion of their visa allocation just to avoid penalties for not meeting their target in Saudi Arabia. In recent years it has also been possible to return or 'freeze' visas rather than sell them on to unlicensed subagents and touts. Yet, this would mean losing often very significant down-payments for flights, accommodation and Hajj-related services.

7.4) Hajj Organisers, Sub-Agents and Touts

Other Saudi licensed Hajj organisers may feel limited by their official visa cap and seek to grow their business by buying in additional visa numbers from other Munazzams. In reality, such organisers may have responsibility for taking several hundred UK pilgrims or more for Hajj. A few organisers have also applied to the Ministry of Hajj under different names and currently have two, three or four licenses. The number of merged Munazzam companies in the UK complicates these chains of buying and selling visas further, with disputes between companies having the potential to impact on services to pilgrims.

As Muslims in Britain are dispersed as a population and there are no Munazzams, for example, in Scotland, Wales or the North of Ireland, some organisers nurse local travel agents with high street shops to formally take on selling their Hajj packages as a side business. A formal agreement should be in place between the Munazzam and any sub-agent to meet legal requirements in the UK (See Chapter 8). Normal commission rates would also be part of this relationship. However, a Hajj visa could still end up being re-packaged and re-branded with a mark-up in price.

UK governance officer -

Regulating the subagent is the biggest issue; finding out who is the subagent

UK governance officer -

They are not sticking to [ATOL] primary provider rules. They are taking the package and adding or minusing aspects just to make the profit margin a bit higher

Moreover, other licensed Hajj organisers also claim that they are "blackmailed" by sub-agents and touts with whom they have no formal or legal connection. The latter may collect pilgrims' passports and then go shopping for visas from Munazzams at a good price. In general, these chains of buying and selling are further extended as sub-agents have their own informal networks that they rely on to 'tout' for business.

Traditional 'economy' package markets especially are still very much rooted in the informal networks of mutual trust, honour and co-operation associated with particular religious, ethnic and family ties. So, the 'tout' may be a family member, local imam, taxi driver working from home or a shopkeeper. This first point of contact for the intending pilgrim typically deals in cash, may not provide contracts, receipts or accurate documentation. Thus, in some circles Hajj packages can be bought and sold informally like Asian wedding jewellery sets. Ultimately, touts are not responsible for the delivery of the services they are selling.

Former UK licensed Hajj organiser -

A sub-agent has taken 70 spaces. But he depends on somebody in Bristol to give him about 25 to 30 ... She used to be a community worker ... [she has] got a network.

UK Muslim community association -

Unfortunately it's still a lot of people who are travelling with the 'chacha lalas' ['uncles'] ...



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CBHUK and City of London Police meeting poster, 2012.

7.5) ATOL Licenses and Hajj Visas: New Players, Old Problems?

The organiser-subagent-tout structure is longstanding in the UK Hajj sector. It reflects how Hajj was typically organised before Saudi Arabia sought to regulate Munazzams in the 2000s. However, a new concern for professional licensed Hajj organisers is agents for Hajj-related airlines diversifying into selling Hajj packages. Such companies are longstanding ATOL licence holders, for example, in the 'visiting friends and family' sector, and have strong connections to South Asia. Thus, they typically have the advantage of very good access to discounted airline seats. Having set-up various Hajj-related trading names, they also have the capital to promote their packages heavily on Google via numerous websites.

They may have Umrah licences, which given Vision 2030, are now being shared very widely by the Ministry of Hajj. However, no doubt wary of this new threat to their own business, Munazzams suggest that they are incorrectly promoting themselves as both Hajj *and* Umrah approved agents. But this is not something that can be challenged in the UK. Of course, like traditional sub-agents, such companies do not have guaranteed access to visas in their own right. But some Munazzams are selling visas to them. While selling Hajj packages and visas in this way remains entirely legal in the UK, this scenario underlines a longstanding issue which can leave pilgrims disappointed if the promised visa does not materialise (refunds may be provided). Moreover, like the tout in the UK, online call-centre staff in Pakistan or India are typically focused on commission rather than managing expectations.

UK licensed Hajj organiser -

These Munazzams who have quota, why are they giving these visas to these agents? ... If these agents do not have a visa, that's it. Maybe one year, two years, they'll be eliminated.

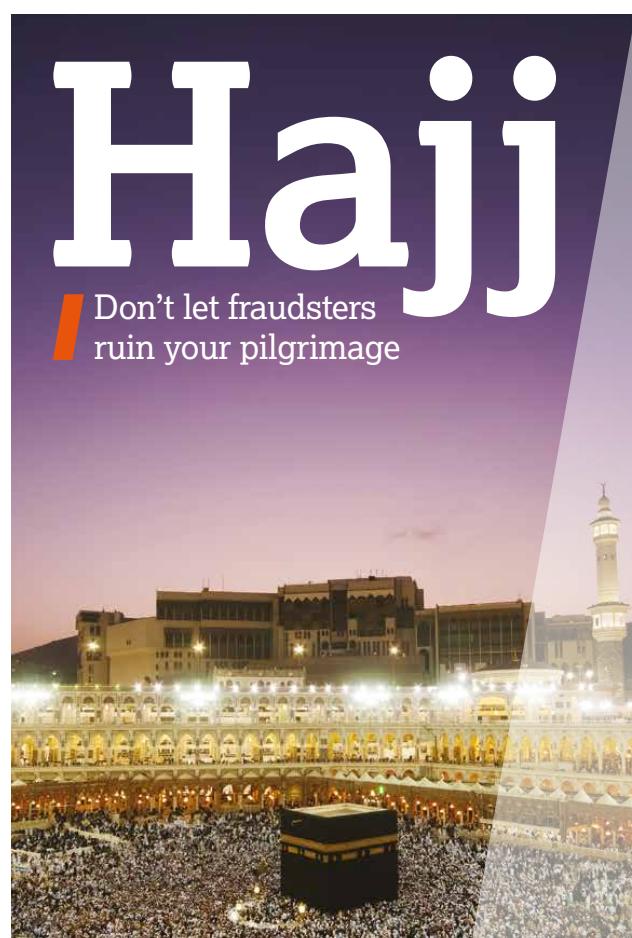
UK Muslim community association -

The day before [our departure] we got a phone-call saying, "You're not going, you haven't got a visa" ... He was one of these sub-agents and I was partly to blame for not doing the check.

As part of the globalisation of Hajj organising among private travel companies in the West, a couple of American companies, again with no Ministry of Hajj license for the UK at least, have also started trading here. They too have gained access to perhaps several hundred Hajj visas by way of the unofficial circulations described above. However, at least one such company was apparently advertising packages without an ATOL license. Yet, when a Saudi licensed UK Hajj organiser reported them to the Civil Aviation Authority (CAA), they were apparently advised that the telephone number advertised online was based in America. As such, no action was taken.

Unless a particular problem is brought to their attention, the Saudi authorities seem to be pragmatic about this circulation of Hajj visas in the UK too. UK and European law does not recognise a distinction between Hajj organisers licensed by Saudi Arabia to sell visas and packages and other travel agents licensed by ATOL (Chapter 8). Yet, long chains of more or less effectively regulated buying and selling seem to be at the heart of many aspects of Hajj-related fraud.

7.6) Misleading Advertising and Mis-selling



Hajj-related fraud awareness leaflet, 2016.

Hajj-related fraud involves a range of industry problems including incompetence, dishonesty and outright deception. Amongst some sub-agents and touts especially there is inevitably a lack of skills and knowledge of Hajj organiser's responsibilities, while organisers themselves can be unprofessional and disorganised. So, some will take pilgrims' money assuming that they can deliver but over-promise and raise pilgrim expectations, both verbally and in terms of advertising.

A key gap, then, is between the marketing of Hajj packages and the reality on the ground. This boils down to honesty in buying and selling. Managing expectations is seen as a duty by professional Hajj organisers. How they explain Hajj to the pilgrim in advance is key. While this may not be addressed by some organisers, sub-agents and touts, an example of good practice was the Hajj organiser who spoke only of sub-agents in terms of 'referrals'. When the client is referred to this licensed Hajj organiser they still explain the hardship involved: "every single customer gets spoken to ... and we will be travelling with them ... even if people are living in Scotland he [his father] used to insist that they come to the pre-Hajj seminar".

UK licensed Hajj organiser -

There are still groups out there which provide no more than an A5 bit of paper with the price, dates and 3-4 bullet points.

UK licensed Hajj organiser -

Never promise what you can't produce ... I always paint the darkest picture possible. He gets more than what I promised.

A lot rests too on the star rating of Hajj packages. Perhaps unsurprisingly, pilgrims cannot always easily understand the difference between a 5* package priced at £9,000 and one at £6,000. It takes time and effort too for the Hajj organiser to explain this. Furthermore it is widely acknowledged that a 5* hotel rating in Makkah and Madinah does not equate to a 5* rating in the UK or even the rest of Saudi Arabia. One argument is that some Munazzams' accommodation agents in Saudi Arabia are unfamiliar with the UK and its standards and so some UK agents have taken advantage of these discrepancies in grading/descriptions, as well as making use of unrated apartments instead of hotels.

UK governance officer -

Who decides what is platinum and what is gold [standard in terms of a package]? You guys [licensed Hajj organisers] need to be more consistent among yourselves.

UK licensed Hajj organiser -

Often they're not comparing an apple with an apple.

While in international chains especially one expects international standards, apparently, this issue is being currently being addressed in Saudi Arabia with all 5* star hotels being downgraded to 4* until they can show the Saudi Commission of Tourism and National Heritage that they meet the higher criteria. More generally, a UK governance officer queried whether it was right to call certain packages 5* in their entirety if this refers mainly to hotels and possibly Hajj services in Mina. Only a small number of UK organisers have access to VIP tents. Top organisers and packages also offer business class flights.

7.7) Things Beyond Hajj Organisers' Control?

UK Muslim community association -

There are some people out of their depth ... they're not business savvy; they don't do their homework and that's how they end up in trouble. They might not have the intention of robbing people or mis-selling but they find themselves in that situation

UK licensed Hajj organiser -

The dynamics of Hajj are different to everything else. You can't compare Hajj travel with any sort of holiday tour no matter how well you organise things

According to a UK governance officer, Hajj organisers "are very, very vulnerable to changes beyond their control". Hajj is a time-limited event in a single destination concentrated on one month at most and one day during a period of five days in particular. The visa is the riskiest component of a Hajj package. The way visas are secured by agents who are not licensed Hajj organisers is typically not explained to, or understood by, most pilgrims. So, there is a "heightened potential for difficulties" in the Hajj sector.

UK governance officer -

The uniqueness of the Hajj sector is an additional risk beyond that of being a regular package organiser ... there is something very specific [a visa] you've got to supply

If Hajj visas may be difficult to secure because of the system of organisers and agents highlighted above, so too are airline seats. In an ideal world everyone would like to travel direct to Hajj on a day of their choice. However, organisers have to tell customers: "it could be a day before, a day after, it could be the day that we are advertising ... Passengers have to be flexible". Organisers can request flights from airlines and try to synchronise dates correctly but there are finite seats and only particular airlines travel to Jeddah and Madinah. Airlines also do not generally provide direct access to their seats. Wholesalers or consolidators drive a hard bargain and it is difficult for small or new companies to get quick and easy access. Thus Hajj organisers have to start selling packages before dates are confirmed by airlines after Ramadhan. In March 2019 one Hajj organiser claimed that 70% of the market who have already sold their packages did not have their flights details yet.

In terms of hotels, down-payments of one-third to 50% are made but they are often advertised to customers as "x hotel or similar". Moreover, the Saudis work on the Islamic Hijri calendar and agents in the UK work on the Gregorian calendar. Occasionally, rooms are double-booked for this reason. The delivery of Hajj services by Mutawwifs can also be unpredictable, for example, because of congestion. If an organiser is allocated tents in a poor area or tents do not fit their group size, there may be little one can do there and then. In any case it is the Munazzam who is responsible under both UK and Saudi systems if pilgrims complain.

7.8) Bargain Hunters and Pilgrim Education

The screenshot shows the Foreign and Commonwealth Office's Hajj Advice page. It includes sections for 'Prepare before you go', 'How the FCO can help during the Hajj', and 'Useful contact information'. It also features a QR code for travel alerts.

Foreign and Commonwealth Office, Hajj 2019 Travel Advice, @UKinSaudiArabia via Twitter

UK licensed Hajj organiser -

The problem is that people go looking for bargains. This is where the fraudsters are taking advantage.

UK licensed Hajj organiser -

It may not be the pilgrim's fault but it is there, the lack of knowledge and understanding of what to book, who to book with, and why to book with certain companies

Many licensed Hajj organisers also argue that the UK Hajjaj need to take more responsibility for their choices. The former are lucky to get more than one-third of their bookings before Ramadhan. One Hajj organiser reported that more than 50% of his business is 'last minute', especially among British Pakistanis. Hajj organisers in the mid-to-lower market segments argue that their pilgrims can also be very fickle: "I've had pilgrims leave me because I'm £50 more expensive". There is an economy market segment that wants to pay as little as possible. But some organisers may take a booking at any price. And for such prices a Hajj organiser typically will not do anything beyond what is required and have the minimum number of helpers. Other pilgrims pay 2* prices and still expect 5* service, perhaps because of the high price of Hajj packages these days.

UK licensed Hajj organiser -

Ask yourself, "Why is this guy cheap?" ... You cannot leave your doors open, windows open and then blame the police.

Another licensed Hajj organiser argues that it is "common-sense" that one would pay no less than £6500 for a 5* double room and yet pilgrims still purchase packages being offered at £4800. Such organisers argue that pilgrims need "to do their research". However, while pilgrims may be "ignorant" of the Hajj marketplace – one does not buy a such a package every year – a more professional and less defensive Hajj sector per se would take a more sympathetic view of such a lack of knowledge and understanding, especially among vulnerable segments of British Muslim communities.

UK Muslim community association -

It's not fair to put the blame on the consumers.

Licensed Hajj organiser -

Our Hajjaj, 90% they don't travel [widely] very much. 10%, yes, they are going to different countries, they know the situation.

Some Munazzams and market segments have not done enough in terms of pilgrims education and awareness. Not all pilgrims have an equal capacity to do research or understand the world they are trying to navigate or be the perfect customer. Social deprivation and education are still key issues at the grassroots.

7.9) Future Pilgrims and Social Change



London consultation, March 2019. Wahida Shaffi.

There is some suggestion that social change will fix at least some of the problems in the UK Hajj marketplace. Growing professionalism among Hajj organisers is one factor although the pressure to sell visas when quotas are not met is still significant (Chapter 9). The direction of travel for buying and selling of Hajj packages is online as part of Vision 2030. So might Hajj-related fraud be a generational thing? Will buying and selling in informal community settings soon be a thing of the past?

UK governance officer -

[Third generation Hajjis] may not feel obliged to go to their cousin's uncle in the neighbourhood who runs a travel agency around the corner.

Even if there is something in such observations, we are not there yet. Towards the top of the market a leading Hajj organiser still reports some hesitation in the UK when using online booking systems for pilgrimage tours. And if long chains of buying and selling online evolve outside of the Ministry of Hajj's own systems, web-based fraud could be a growing problem.



8. How is the UK Hajj Sector Regulated and Governed?



Civil Aviation Authority, Hajj 2019 Travel Advice, @UK_CAA via Twitter

8.1) Department of Business Summit Meetings

The then Department for Business, Enterprise and Regulatory Reform responded to the petitioning of ABH by calling summit meetings of Hajj organisers in 2008-9. The issues were not on the radar of the Civil Aviation Authority (CAA) and most local authority trading standards departments because there were few complaints. However, on further inspection, there was found to be a compliance issue in terms of Air Travel Organisers' Licensing (ATOL). Hajj organisers had an alarming lack of knowledge of their legal responsibilities under the EU Package Travel Regulations (1992) too.

UK governance officer -

They [Hajj organisers] said, 'I didn't realise I was selling a package holiday ... It's a pilgrimage'

A working group was thus established to develop a national code of practice, a model contract and a means of signposting pilgrims to reliable traders. It was envisaged that the contract would have clauses informing the customer about the type of things not within the organiser's control in Saudi Arabia (see Chapter 7). Formalising the organiser/subagent relationship was also advised. Better control of - and transparency about – roles and relationships in the market and associated paperwork was seen as key to achieving improvements.

However, government was clear that taking this agenda forward would have to be industry-led. For instance, traders could seek advice from the Association of British Travel Agents (ABTA). The UK travel sector is populated by many trade associations but the best known is still ABTA. However, while around 50% of organisers and agents in the travel and tourism sector per se are its members, in the UK Hajj sector the figure is only around 5%. This is another measure of its distance from the 'mainstream'. All ABTA members are bound by a code of conduct, while the association also runs its own arbitration service to resolve disputes with customers. However, first and foremost, ABTA lobbies for the interests of its members.

While some Hajj organisers had also been keen for the UK government to influence the Saudis on their behalf, the Department sought to correct this view. Establishing their own, broadly-based trade association at the national level would enable Hajj organisers to lobby both the UK and Saudi authorities in their own right.

8.2) UK Frameworks: ATOL and PTRs

In the UK any trader or business selling travel arrangements including air travel is legally bound to comply with the Civil Aviation Air Travel Organisers' Licensing (ATOL) Regulations (2012). These provide financial protection for consumers should their provider go out of business. A bond, currently £50,000 minimum per annum, is required. These regulations date back in one form or another to the 1970s and are overseen by the CAA but enforced by local authority trading standards departments. Companies must financially protect flights if they are not in a position to provide passengers with airline tickets at the time of booking. As we have seen, this is often the case in the UK Hajj sector.

The 1992/2018 EU Package Travel Regulations (PTRs) – as well as the 2006 Fraud Act and 2008 Consumer Protection from Unfair Trading Regulations 2008 - go beyond ATOL protection, which does not address contractual matters or the quality of service received by consumers. If any part of a package is not provided e.g. visas, which is the riskiest element of a Hajj package for travel agents to deliver, the PTRs mean that customers are entitled to an alternative trip (not an option in the case of Hajj) or a full refund and, potentially, compensation



ABTA, Hajj 2018 Travel Advice, @ABTATravel via Twitter

8.3) Towards a 360-Degree View? Gaps Between UK and Saudi Regulations

Not unreasonably, the UK governance authorities approach Hajj as a form of international package travel framed by these UK/EU legal requirements. However, while this remains the basis of consumer protection, the structure of the Hajj sector in the UK is impacted by frameworks from Saudi Arabia too (see Chapters 2 and 3). UK law allows travel agents to create and sell their own packages including Hajj packages. But, the system of regulating Hajj in Saudi Arabia does not (at least in theory) allow Hajj organisers to share, pass on or sell their visas.

Arguably, this framework is not recognised sufficiently by the UK authorities who effectively see Munazzams and ATOL-certified agents as being 'licensed' in the same way. A more 360-degree view of Hajj organising which explained the significance of the Hajj visa would make for much clearer advice to pilgrims.

UK Muslim community association -

It's very difficult for ordinary people to understand who is licenced and who is not licenced and what does it mean when the company says it's licenced.

UK governance officer -

The biggest needle in the haystack is trying to find the [Saudi] licensed providers. Even the Ministry of Hajj website, it doesn't work most of the time and it's fairly out of date

Chapters 3 and 7 showed that the unofficial circulation of Hajj visas among licensed Hajj organisers and sub-agents is a reality in the UK. The PTRs require only that a customer is advised of the need for a visa. So, UK travel agents can sell Hajj packages without supplying – or even having guaranteed access to – Hajj visas at the time of making a sale.

UK governance officer -

The Saudis are no doubt aware of the sub-agent set up ... They are really quite serious about pulling the rug on organisers selling improperly or acting wrongly. Yet, they are not in a position to get into how this is administered in the UK

UK licensed Hajj organiser -

The flaw is here because all they [the UK authorities] see is ATOL; [for their part] the Saudis recognise ATOL and IATA

Also, while it is widely recognised that organising Hajj entails certain matters beyond the control of organisers, in recent decades travel organisers have only successfully relied upon arguments about 'unforeseeable circumstances' in the case of the volcanic ash cloud in Iceland (2010) and the events of '9/11' (2001). As specialists in their field, for instance, travel organisers cannot claim that hurricanes in the Caribbean are unexpected. So it is with the challenges of organising Hajj.

The PTRs cover all categories of package travel, from beach and adventure holidays to pilgrimages. Indeed, the 2018 iteration of the PTRs was 3 years in the making. So, while Brexit could change things, there is almost no chance of amending this legislation to recognise Hajj as a unique package as some organisers and Muslim organisations might wish.

8.4) Self-Regulation and British Muslim Pilgrim Welfare Associations

Government probably underestimated the challenges of professionalising the Hajj sector in the UK. The summits did provoke a marked increase in ATOL registrations. However, my own spot checks on Saudi licensed Hajj organisers in recent years suggest 15-20% may still not be ATOL registered at any given time. According to the CAA, in terms of awareness of its legal responsibilities, the Hajj and Umrah sector is improving but it is still behind the curve of the package travel sector per se. So, despite the emergence of regional trade associations in the years immediately following summit meetings with government (Chapter 9), progress towards greater self-regulation appeared to outsiders to be slow.

The pilgrim welfare charity, ABH, was very sceptical of self-regulation as a solution to Hajj-related frauds and lamented the lack of political will in the UK to implement "the rule of law", as well as support a "permanent system ... to address all these issues". ABH considered taking on such a role itself.

UK pilgrim welfare association -

There was [the] idea that [the] Saudi authority may contact us before giving [a] licence to Hajj operators in the UK ... [to] check whether this person is ok ...

UK pilgrim welfare association -

I had so many offers from Saudi business people that we should become their partners ... [But] we only want to provide the welfare. We don't mix business and welfare

ABH also saw a complementary focus on better 'community awareness' of consumer rights as a 'soft approach'. However, the openness to industry self-regulation among other Muslim organisations was seen by government as a more "progressive" alternative to "dragging people off to court".



Representatives of the CAA and CBHUK with presenters of BBC One programme, Rip-Off Britain, 2017

In this context, CBHUK and the social enterprise company, Hajj People (2009-), sought to fill a seeming vacuum in leadership of the UK Hajj sector. For example, the idea of a British Hajj and Umrah Council (2011-18, see Chapter 9) envisioned an umbrella organisation, which claimed to be able to represent both pilgrim and organiser interests. With agencies inevitably dipping in and out of the Hajj sector on a seasonal basis, through its events, web presence and initiatives, CBHUK in

particular established itself as a credible partner for UK governance authorities such as the CAA and City of London Police (Action Fraud). Such networking has been a key enabler too of the new APPG on Hajj and Umrah established in 2018. However, in general, UK governance officers still report widespread confusion concerning the rival factions competing to represent the UK Hajj sector.

UK governance officer -

*We're never sure whether it's an organisation or someone calling themselves an organisation ...
We've never really pinned them down to any extent and what their interests are*

UK governance officer -

I get lost with different agendas confusing the whole issue of protecting consumers

8.5) A National Hajj Task Force?

Under a Conservative-Liberal Democrat coalition government (2010-15), in 2012, Baroness Sayeeda Warsi, then Co-Chair of the Conservative Party and successively minister without portfolio in the Cabinet Office, Minister of State for the FCO and for Faith and Communities, established a National Hajj Task Force. As in the case of the Hajj Advisory Group a decade earlier, the emphasis was on leadership from British Muslim communities. Perhaps to address a perceived gap in capacity in the sector, it was chaired by a new Muslim Leadership Panel, which had wide-ranging professional experience, though crucially not in Hajj-related matters. ABH, CBHUK, Trading Standards and the Police were all represented but not initially licensed Hajj organisers.

Unfortunately, the National Hajj Task Force lost momentum, perhaps because Warsi resigned her ministerial role in 2014 over government policy on the Israel-Gaza conflict. Eventually, in 2015, what was intended as a national source of advice for pilgrims was published online at the MyHajj website: <http://myhajj.org.uk>. However, despite the endorsement of key stakeholders it has not been maintained and is now out-of-date.



Launch of the National Hajj Task Force, British Museum, 2012.

8.6) National Trading Standards Board Hajj Enforcement Project

Notably, the launch also coincided with the culmination of a National Trading Standards Board (NTSB) project, the funding of which was perhaps positively influenced by the National Hajj Task Force. With trading standards in the UK organised principally at the local level, the NTSB co-ordinates selected priority activity to combat rogue traders nationwide. Based on its own pioneering work in the Muslim pilgrimage sector locally, Birmingham City Council Trading Standards Department successfully bid for £100,000 and during 2014-15 took a national lead on Hajj-related enforcement. A senior officer oversaw all complaints (66 in total) received from several sources: i) establishing the relevant intelligence; ii) sharing the complaint with the appropriate local authority, iii) providing ongoing support and monitoring progress. Hitherto, there had been limited interaction nationally between Trading Standards and the UK Hajj sector.

UK governance officer -

If this model was replicated across the country then we would have more compliance

Apart from its local connections to ABH, Birmingham City Council Trading Standards was also serving a population with more than 20% Muslim background in 2011. The sentencing of a trader for mis-selling Hajj flights and accommodation (BBC News Online 12 December 2011) encouraged trading standards officers to investigate further online and visit high street traders. They proactively identified that only 4/40 local Hajj and Umrah traders selling packages on the high street or websites were fully compliant in terms of ATOL and PTRs. When the same investigation was repeated in 2012 many organisers had stopped providing Hajj packages, and of those still trading, 11/16 were compliant.

Officers, including those of Asian and Muslim background, also began to build trust in communities to encourage better reporting of complaints. They attended mosques and community centres, ABH and CBHUK events, as well as engaging the press and media. This raised the profile of Trading Standards among Muslim communities.

8.7) Summary of NTSB Project Results

The investigations in Birmingham during 2011-12 seemed to confirm much of the anecdotal evidence and concerns raised by ABH. The results of the 2014-15 NTSB project also corroborated this. Joint inspections of traders in areas with significant numbers of Hajj and Umrah organisers and agents were undertaken alongside City of London Police and local Trading Standards Departments. The 18 authorities inspected included various London boroughs, Lancashire and the North-West, as well as West Yorkshire. Crucially, such proactive enforcement activity would not have taken place had it not been for the NTSB project.

As the data below shows, there was 81% non-compliance in terms of ATOL documentation, which is perhaps the simplest issue to identify on a trader visit. CAA regulations are clear that customers need to know who they are booking with. ATOL holders can appoint agents to sell their packages but from 2012 especially there has been more emphasis on written agreements between organisers and agents, as well as disclosure of their relationships to customers in promotional

materials. Only the primary provider (or organiser) can legitimately use the ATOL logo unless the agent is ATOL-licensed in their own right.

NTSB Hajj Enforcement Project Results (Source: ABH correspondence, 2015):

- 182 premises visited across 19 authorities
- 81% (147 traders) non-compliant
- 87% (128) of these issued notices/warnings
- 4 given formal cautions
- 13 prosecutions initiated

Typical examples of non-compliance included:

- failing to give out key documents,
- falsely claiming to offer ATOL registration
- failing to disclose agents of an ATOL holder
- not including the name of the principal ATOL holder

During the NTSB project each individual local authority decided what enforcement action was appropriate and, as Table H shows, they typically sought to deal with non-compliance by sending businesses letters of warning.

Table H: NTSB Inspections 2014-15, No. of Traders Most Visited by Local Authority (Source NTSB, 2015)

Authority	Premises Visited	Fail	Pass	Action
Luton	26	22	4	21 x Warnings 1 x Prosecution
Blackburn / Darwen	23	22	1	21 x Warnings 1 x Prosecution
Lancashire	19	16	3	16 x Warnings
West Yorkshire	18	10	8	9 x Warnings 1 x Caution
Newham	15	14	1	9 x Warnings 3 x Cautions 2 x Prosecutions

Despite evidencing high levels of ATOL non-compliance and 94 per cent of local authorities claiming they required continuing support with such work, other priorities and perhaps a lack of evidence linking Hajj-related fraud to serious organised crime meant that the NTSB could not continue to fund Birmingham's work at the national level.

UK governance officer -

It's down to local trading standards now ... [But] I haven't seen any changes ... I haven't seen any prosecutions. I think there's got to be a national lead ... Complaints just get passed on to the local authority

8.8) Analysis of Prosecutions 2012-18

Raw data shared with me by the CAA in March 2019, identifies that between 2012-18 just 14 Hajj and Umrah package organisers were prosecuted under the Consumer Protection from Unfair Trading Regulations 2008 (CPRs) and The Package Travel, Package Holidays and Package Tours Regulations 1992 (PTRs), which were replaced by The Package Travel and Linked Travel Arrangements Regulations 2018.

The number of prosecutions is small. In all, 9 were brought under CPRs, mainly for false claims about ATOL/ITA protection including unauthorised use of these logos, while 5 prosecutions were brought under both the CPRs and the PTRs for not providing information or providing false information or not arranging insolvency protection.

The data also underlines that Birmingham City Council Trading Standards Department is more proactive than other local authorities when it comes to identifying and prosecuting Hajj-related non-compliance.

Location of Organisers/Agents Prosecuted: (Source: CAA 2019):

- 8 (57%) package organisers are/were Birmingham-based
- 2 more are/were based in the Midlands (West Bromwich, Leicester)
- 3 in East London (Tower Hamlets, E7 and Forest Gate)
- 1 in the North of England (Ashton-under-Lyne)

Prosecuting Local Authority: (Source: CAA 2019):

- 11/14 (79%) of prosecutions were actually brought by Birmingham City Council Trading Standards
- 1 each prosecuted by Trading Standards in Leicester, Newham and Tameside respectively.

CAA and trading standards systems do not typically identify Hajj and Umrah organisers or agents separately from the travel sector per se. Therefore, this data, which had to be selected by the CAA using contextual knowledge of the sector, does not differentiate either between Saudi licensed Hajj organisers and those agents who do not control access to visas. Neither are UK compliance-related prosecutions notified to the Saudi authorities.

However, based on my own general knowledge, 6/14 (43%) companies prosecuted 2012-18 are (or have in recent years been) Ministry of Hajj licensed agents. Based on information on the Licensed Hajj Organisers trade association website (which may not be up to date) all but one of these are also its current members.

8.9) Action Fraud: City of London Police



Working with pilgrims at the airport, City of London Police, 2010s.

UK governance officer -

You'd get one person in each area and everyone will think this is a minor issue ... but when Action Fraud puts it all together you can see there's hundreds of victims and it's something that should be dealt with

While information-sharing between agencies is not always easy initially, Birmingham City Council trading standards officers regularly partner with the City of London Police (CLP), which hosts Action Fraud, the national clearing house for every fraud report in the country. Data collected is collated by the National Fraud Intelligence Bureau and work on Hajj has an ongoing 'project' status. Between 1 January 2013 and 31 December 2017, 177 crime reports relating to Hajj fraud were received, with an overall decrease in reports (or reporting) over this period. See Table I below.

Table I: Crime Reports of Hajj-related Fraud, 2013-17
(Source: Action Fraud, 2017)

Year	Reports
2013	79
2014	34
2015	40
2016	7
2017	17

The average claim in 2017 was £5,869, with total claims of £99,770. Most reports (7) were received from Greater Manchester Police.

There is realism that such figures are "almost meaningless" because in contrast to the very high levels of ATOL non-compliance found by the NTSB project, levels of reporting are still suspected to be "horrendously low". The feeling of officers is that in the past not enough attention was paid to crime in the Hajj sector and there are still real victims out there who are not coming forward. Thus, in addition to the usual channels of gathering crime reports, CLP is now also receiving new intelligence from sources such as the UK and Europe Hajj Corporation (UKEHC, <http://www.ukehc.com/>), which claims to be the "UK's first ever Hajj and Umrah Governing Body".

While such claims to a regulatory role in the sector seem highly inflated, UKEHC's emergence and the services that it is seeking to provide to Hajj organisers and to regulators, highlight the yawning gap between compliance and enforcement in the sector. It remains to be seen whether UKEHC has access to sources of additional complaints based on consumers' online activity. Information from such channels could boost reporting of Hajj-related fraud.

Low levels of reporting mean that there is no justification for CLP, like many trading standards departments, to command more resources to investigate proactively. Thus, educating Muslim consumers on crime reporting and prevention in collaboration with Muslim charities (and potentially trade associations) remains key. The CLP are also working with the Association of Muslim Police to deliver outreach with mosques and at airports nationwide. Such engagement, pioneered by trading standards officers in Tower Hamlets and Birmingham, is viewed as a means of developing more positive relations with Muslim communities.

Indeed, Hajj-related fraud has often been kept on the authorities' agendas by the professional interest and goodwill of policing and trading standards officers who have other 'day jobs' but have come to develop experience in this field. Yet, during its NTSB project in 2014-15, Birmingham Trading Standards' partnerships with local police forces still sometimes saw educational work in mosques bundle Hajj-related fraud with issues of counter-terrorism and money-laundering.

8.10) Putting Enforcement in Context

UK licensed Hajj organiser -

How can you have a corner shop, it's a fruit shop, that has Hajj and Umrah on it? They're not being proactive enough. They just need to walk about and they'll see.

UK governance officer -

Most of our regulation is through licensed [organisers] dobbing in [informing on] the unlicensed.

Like pilgrim welfare charities, many Hajj organisers would also like the UK authorities to enforce the existing regulatory framework more proactively. They pay a lot of money for their ATOL licenses and resent the fact that at least some unprofessional Hajj organisers and agents take advantage of limited compliance checking. However, the CAA is keen to correct "the perception that we will drop everything and deal with it". Moreover, they cannot easily "switch off" a trader. The overall emphasis of the regulatory system is on offering advice to correct poor practice. It is also very difficult for the CAA to refuse an ATOL licence because an applicant is inexperienced. So, the working assumption is that "hopefully" companies will comply.

UK licensed Hajj organiser -

ATOL is not going to knock on every door for people who are operating three or four months every year. So they [organisers and agents] will take this risk.

UK governance officer -

I've just prosecuted an ATOL holder for fraud ... Why is he still holding a licence?

Trading standards enforcement across the country is also very uneven. Birmingham has operated a “full-on” zero tolerance approach. But other local authorities, including some areas of high Muslim population density, are seemingly more pragmatic. Some Hajj organisers query using the blanket term “Hajj fraud” to include ATOL/PTRs compliance issues. For them, fraud is “running away with someone’s money” and the suspicion is that “it’s easier to prosecute somebody when they label it ‘Hajj fraud’”. Yet, as we have seen, nationwide, trading standards departments are probably more discriminating about prosecution than some traders allow and willing to take account of when a trader “might have made a mistake”.



Partnering with Birmingham City Council Trading Standards Department, City of London Police, 2018.

UK licensed Hajj organiser -

I have reported to Trading Standards three or four agents the last three months and they did nothing with it

UK governance officer -

The actual enforcement is very imbalanced from different parts of the country due to resources, expertise and other aspects.

As noted above, complaints are still rare. Anecdotally, and despite NTSB training 19 local authorities, some seem not to even have the capacity to acknowledge receipt of complaints. Thus, a certain volume of complaints may also be required to trigger an investigation. So, while just one complainant might not meet that threshold, a group of complainants might be taken more seriously. It may be that complaints have to be actively mobilised by MPs, community groups and key governance officers with an understanding of the dynamics of a given context. The history of the trader may also be taken into consideration. This is assessed on a case-by case basis.

UK governance officer -

Many of the complaints are a civil matter and would not warrant a criminal investigation ... 90% of the package was delivered, 10% was outside their control

UK governance officer -

You can't arrest your way out of these things

Clearly complaints also have to be judged to have breached a particular piece of legislation to be taken forward. However, there sometimes appears to be a difference of opinion concerning the boundary between civil and criminal complaints, with the former concerning only certain contractual obligations. Even when the law is known to have been broken, there is will be a judgement call on whether it is in the public interest to prosecute based on the evidence available.

Prosecutions can take 2-3 years to come to fruition and consumers who are left out-of-pocket by an initial fraud can still be left without redress. Interestingly, at least one UK legal firm would like to offer fixed-cost legal advice for all package travel disputes, a service that, in theory, Hajj organisers would be asked to fund (Asian Express, 8 October 2018). The proposal is for an online claim-automating portal providing independent advice (on civil cases) without going to court.

9. How Professional is the UK Hajj Sector?



UK Licensed Hajj Organisers at Establishment TEAA, Makkah, 2019. @LHOUKLTD via Twitter.

UK licensed Hajj organiser -

Traditionally, the industry has been quite unprofessional ... I don't think we have a choice but to become more professional ... In the last few years amongst like-minded operators there has been a lot of improvement and a lot of good practice we can share ... We will get there; I think it'll take time

The first generation of UK Hajj organisers were not typically professional travel agents. They did not treat escorting relatively small groups of people for Hajj as a fully-fledged business. Apart from a few companies, most led groups independently from their local communities. However, the commercialisation and restructuring of Hajj-going in Saudi Arabia increased the regulation of private Hajj organisers in the West through the 2000s. In the UK, too, the authorities periodically started to pay greater attention to compliance in terms of ATOL regulations and PTRs. However, until very recently, the UK Hajj sector has struggled to establish a viable trade association on a national level.

A change in this regard has been driven by a like-minded segment of 'second-generation' Hajj organisers. A few of these established pioneering upmarket companies in the late 1990s and early 2000s. Many others have joined or inherited family businesses during the last 10 years. Between them they possess more of the social and educational capital necessary to engage with modern systems of Hajj organisation and governance both in the UK and Saudi Arabia. Moreover, they have also come to share a camaraderie and awareness of the necessity of building bridges among competitors to defend the reputation of their industry. Their aim is to create a shared platform for the representation of their collective interests and work towards better self-regulation.

9.1) A UK Hajj Organisers' Trade Association?

UK licensed Hajj organiser -

It was not welcomed at all because, the Uncles, they saw us as little kids ... these people had been running the scene for many years. They don't want to become official.

A first, short-lived attempt was made to establish the Ministry Approved British Travel Agents (MABTA) trade association by Hajj organisers in London and Birmingham in 2004. These organisers represented the more established travel agencies rather than those dealing in Hajj and Umrah only, many of whom still operated from home rather than the high street. Around 15 agents out of 100-150 at the time had come together to discuss the chartering of aircraft in a bid to reduce base costs. To some this also seemed like a golden opportunity to learn from one another and try to improve the poor reputation of the sector, as well target better treatment by air travel consolidators and the authorities in Saudi Arabia. However, MABTA met with resistance from the wider sector.

Some Hajj organisers see commercialisation and business regulation as an important catalyst for professionalization. But in the early 2000s, despite the law of the land, many others did not accept that holding an ATOL licence should be one of the criteria for MABTA membership. Moreover, there were ethnic and regional rivalries between organisers: "everybody wants to be a chief". As a member of the nascent MABTA group recalls: "We could not [even] sit together", so great was the competition and suspicion among Hajj organisers.

UK licensed Hajj organiser -

You don't get everybody in the same frame of mind ... I do my own thing. It keeps me free.

There was also the liking for independence often associated with smaller trading concerns. Indeed, a fear of losing business still remains an issue in what remains a relatively new industry: "At the beginning everyone is frightened of each other". Some agents are very aware of their competition and seek to undercut their rivals or take advantage of another's difficulty. However, as the effort to establish MABTA shows, cooperation between Hajj organisers is also a longstanding and everyday necessity.

9.2) Regional Associations and Competition from Entrepreneurs

UK licensed Hajj organiser -

If a Munazzam sees a straight route and a route full of humps and bumps and verges he will choose that [the latter] road.

As we saw in Chapter 8, representatives of Hajj organisers were encouraged by the Department of Business to establish a trade association to self-regulate their industry. In the years that followed the perception of government was that little was happening to advance this project. However, that is not entirely true. At least two ethnically-based regional trade associations were established, while experienced Hajj organisers notable for their professional background also sought to promote good relations and cooperation among all in the sector.

The Association of British Hajj and Umrah Agencies (ABHA) was a short-lived response among British Bengali Hajj organisers in East London (2009-12) to the highly publicised Qibla Hajj Kafela case Hajj-related fraud case. Its 10-12 members served around 80% of pilgrims in Tower Hamlets, the UK district with the highest concentration of British Muslims.

The UK Hajj Association (2010-17) reflected the shared interests of British Pakistani Hajj organisers across the former mill towns of the North of England and in Birmingham. It made some progress towards improving compliance by working on a standard contract and raising awareness of quality of service matters among pilgrims by appearing on British Pakistani satellite TV channels.

Such initiatives fell short of the national level unity government had encouraged. So, as noted in Chapter 8, this saw charities such as CBHUK and social enterprise companies such as Hajj People seek to fill a seeming vacuum in the UK Hajj sector. Both were communications-savvy mentees of Lord Patel ready to adapt a headline concern with service to pilgrims to a new, market-driven reality.

9.3) The British Hajj and Umrah Council and CBHUK's 'Whitelist'

Hajj-related compliance and fraud issues in the 2000s had tarnished the sector and the banks deemed it high risk because of the volume of cash transactions. Moreover, Hajj organisers seemed divided and lacking in leadership. Therefore, initially, both Hajj People and CBHUK jointly supported the idea of a British Hajj and Umrah Council (BHUC, 2011-18). The BHUC envisaged an umbrella organisation that could mediate - and potentially represent - the interests of both pilgrims and pilgrimage organisers. It would provide the UK Hajj sector with a single point of communication for all external contacts. The upside of this for organisers was arguably that they had little time to devote to externally-facing work, especially in the UK. However, there could be risks of course in delegating authority to others.

As it happens, the BHUC existed mainly at the level of ideas. Hajj People's CEO, who began working in the Hajj sector by selling Saudi mobile phone SIM cards, focused more on 'pop-up' international trade events, especially the World Hajj and Umrah Convention (WHUC). In the meantime, CBHUK sought to build its own relationships with UK Hajj organisers in a way ABH and indeed BHD never did. Developing its own customer charter and code of conduct in 2015-16, the launch of a CBHUK-verified 'Whitelist' of certified Hajj and Umrah organisers (<http://www.hajjinfo.org.uk/>) appeared to have stolen a march on traders in responding to the self-regulation agenda.

Yet, while potentially a pilgrim-friendly means of signposting UK Hijjaj to ATOL and Ministry of Hajj approved traders, CBHUK is dependent on Hajj organisers' subscriptions and support to make such innovations a success. The currency of checks vis-à-vis UK licensed Hajj organisers is an issue, especially in relation to information held in Saudi Arabia. Moreover, CBHUK verification that a Hajj company holds the necessary licenses comes with no guarantee of - or responsibility for - levels of service.

CBHUK was 'first to market' too in terms of an annual 'black-tie' UK Hajj Awards dinner from 2017 (www.thehajjawards.com). The Hajj Awards promotes the UK Hajj and Umrah sector while

Hajj and Umrah-related airlines, hotel chains and telecoms companies are all in London for the World Travel Market. Acknowledging that CBHUK had rapidly become the public face of the UK Hajj sector, in 2018 its CEO was named in the UK's Muslim 100 Power List and CBHUK itself was named Best Community Organisation at the British Muslim Awards. 2018, too, was the year it became the Secretariat to the new APPG on Hajj and Umrah, which is chaired by CBHUK's local MP.

9.4) National Pilgrimage Organisers Association



Former NPOA director addressing World Hajj and Umrah Convention, London, 2018. Seán McLoughlin.

Partly in response to these local developments in the UK, and catalysed by the announcement of Vision 2030 in Saudi Arabia, 2016 saw a group of licensed Umrah and Hajj organisers (some of whom were involved in MABA) establish the National Pilgrimage Organisers Association (NPOA, <http://npoa.org.uk/>). According to its website NPOA has 58 members, though a more aspirational figure of 280 was claimed by a director I interviewed in 2018.

Notably, it is open to both Hajj and Umrah licensed organisers and agents, as well as pilgrimage service providers such as Hajj People. Indeed, the director of Hajj People serves as its Secretary. Thus, the NPOA constitution styles the organisation as the inclusive, self-regulating Muslim pilgrimage representative body for the UK.

The inclusion of Umrah organisers and agents is significant given that Umrah will account for most of the growth in pilgrim numbers projected by Vision 2030. However, the Umrah industry has its own dynamics and challenges, including a recent significant expansion in the number and type of licensed organisers.

Indeed, an unhelpful ambiguity for British Muslims trying to select a Hajj organiser is that, even when companies display the same Ministry of Hajj and Umrah logo, not all Saudi licensed Umrah organisers in the UK are also Saudi licensed Hajj organisers and vice versa (Chapter 7).

9.5) Licensed Hajj Organisers



A founding member of LHO at its soft launch, CBHUK Hajj Debrief, Westminster, 2016. @LHOUKLTD via Twitter.

UK licensed Hajj organiser -
It's been so difficult to form an alliance in the UK.

UK licensed Hajj organiser -
It's our industry [and it is] important to tell the public who we are

In direct response to the formation of the NPOA, Licensed Hajj Organisers (LHO), <http://www.licensedhajjorganisers.com/lho/> was also established in 2016 as a national level organisation. However, membership is restricted to Saudi licensed UK Hajj organisers, which underlines the precedence this group is increasingly publicly claiming over the British Hajj market. Third party agents who may buy and sell Hajj packages are seen by LHO as having less invested in the sector than its Munazzams, who bear ultimate responsibility for British Muslim pilgrims under both UK and Saudi systems of regulation.

With 52 members currently listed on its website among around 117 licensed UK Hajj organisers in 2019, LHO can claim to represent around 50-60% of the Hajj sector. New members are not currently being admitted while in-house organisation is consolidated. But actual membership is verbally quoted at nearer to 70. Eventually LHO may seek to incorporate members from the Umrah sector but that market is increasingly complex. Those behind the organisation were involved in discussions about the formation of NPOA in 2014 but were apparently concerned about being outvoted by the sector at large. Not least in light of the experience of key players in MABTA, the feeling is that the trade is facing a great challenge which should not be underestimated. Thus LHO wants to focus on Hajj, worrying that NPOA might be “biting off more than it can chew”.

UK Hajj and Umrah Organisers' Trade Associations (2016-2019):

- Around 52 licensed Hajj organisers are members of LHO (verbally reported as 70)
- About 15 licensed Hajj organisers (though none in Bradford or Birmingham) are members of both LHO and NPOA
- Around 7 licensed Hajj organisers are members of NPOA but not LHO

As a project LHO seeks to protect and enhance the financial and business interests of its members. From 2016 it began to build its reputation by introducing its brand including a new logo. However, until 2018, when LHO's constitution was passed at its Annual General Meeting, it operated more like a club. In fact, LHO began life as a WhatsApp group for information sharing and support among Munazzams. UK Hajj organisers needed to network, to “come to know one another properly” and “stop fighting and stop backstabbing”.

UK licensed Hajj organiser -
Now you have a second generation of agents. You can actually talk to them. So this is where LHO came [from]



Licensed Hajj organisers, Bradford consultation, March 2019. Wahida Shaffi.

UK licensed Hajj organiser -
No bad talk. We have respect ... within unity you can discuss and it gives you respect in front of others.

In its present phase LHO is working towards some form of representation. Munazzams are starting to see some benefits from their membership. For example, rules change frequently and at short notice in Saudi Arabia. Sometimes they are announced as being implemented “al-yawm” (today). Keeping abreast of the latest regulations is therefore a key challenge for Munazzams. So, translations of information first published in Arabic are a boon. News of the 5% VAT tax introduced in Saudi Arabia on 1 January 2018 was shared with LHO members in advance of its enforcement.

9.6) LHO and the Saudi Authorities

While boosting the global Hajj industry with its new targets for growing pilgrim numbers, Vision 2030 has also meant that UK Hajj organisers face a lot of uncertainty about the future. With timely information sharing and Saudi bureaucracy a longstanding issue, Munazzams are unsure about where they fit into the overall plan. More and more Ministry of Hajj systems, including the advertising of Hajj packages, are moving online. So, while there have been key improvements vis-à-vis the processing of visas for instance, there is a fear that the role or number of private Hajj organisers could change dramatically. For instance, over the years, there have been rumours of having just five - or even only one - Hajj organisers in Britain.

Another of the reasons why Munazzams in the UK want a trade association is to enable better communications and leverage vis-à-vis the Saudi authorities. Some UK licensed Hajj organisers already have a very good reputation with the Ministry of Hajj and the Establishment TEAA. However, one agent may be treated better than another because they have greater social capital in Saudi Arabia. Also, while there is flexibility in the way that some Hajj organisers are treated if one makes a mistake this can also make it difficult to provide critical feedback when services are not up to scratch or when prices are raised. There is not necessarily a culture of allowing or encouraging feedback from UK Munazzams.

UK licensed Hajj organiser -

Everything they say goes, 'Yes sir, no sir'. If you want to be in that market you have to be very tolerant.

UK licensed Hajj organiser -

We pay a lot of money, so on the longer term we need representation [to address this].

In particular, LHO now aspires to do more in terms of negotiating collectively with Establishment TEAA regarding its provision of tents, toilets and electricity in Mina. One organiser reported that the rate Turkey paid for Mina services in 2017-18 was just 200-300 Riyals per pilgrim, whereas UK licensed Hajj organisers paid 2000-3500 Riyals. Turkey has its own Hajj Mission representing 79,000 pilgrims, that is, around three times the number of pilgrims as from the UK. Thus, it is in a strong position to dictate its requirements. However, given the higher rates they pay for a smaller contingent of pilgrims, overall, UK Hajj organisers end up paying the same as, or even more than, Turkey.

UK licensed Hajj organiser -

We are given what the Mutawwif wants to give us.

UK licensed Hajj organiser's guide -

If you take the packages then they look after you ... Some tents are not enough for the people ... The people blame the group leader

It is not clear to what extent the Saudi authorities would recognise a UK trade association and in what capacity unless it was endorsed by the UK government on some level. The FCO is the natural conversation partner of the Ministry of Hajj but it is reluctant to get involved and is directing LHO (and all UK stakeholders) to work through the new APPG on Hajj and Umrah. Nevertheless, the Head of Establishment TEAA (Muassasa) is reportedly encouraging UK Munazzams to become members of LHO and in 2019 LHO signed a simple Memorandum of Understanding with the Establishment.

LHO is beginning to style itself as having an advisory role to the Muassasa on UK private Hajj organising matters. The Ministry of Hajj de-lists Hajj organisers based on Establishment recommendations. So, in theory, LHO could seek to verify or endorse UK Hajj organisers' licenses before they are renewed (a notion not unknown to British Muslim charities and social enterprise companies). Moreover, LHO executive committee members report that they were able to help resolve problems recently when two UK organisers, despite selling all their packages, had their licences revoked for different reasons. Of course, this raises questions about appropriate timelines within the system.

9.7) LHO's, Code of Conduct and Self-Governance

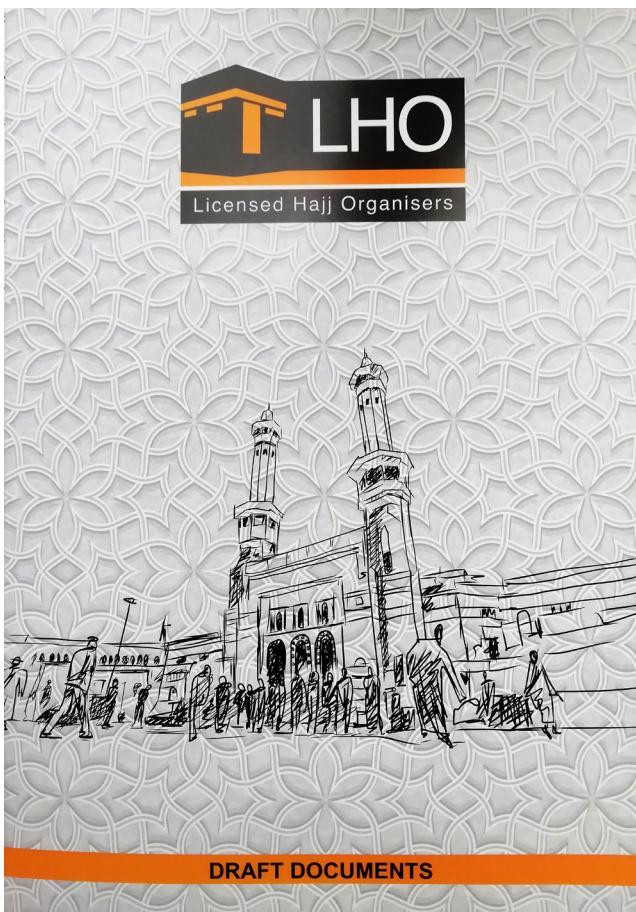
UK licensed Hajj organiser -

Self-governance is probably the best way of improving standards in our industry. Unless we take up self-governance and checking ourselves, basically it'll be very slow.

UK licensed Hajj organiser -

If we carry on with the network approach others will take over ... [there are] many people who are trying to get a portion of this industry by setting up a Hajj mission, by taking a tax on each and every visa.

There is still a perception among some licensed Hajj organisers that the UK government should have done more to help them during the last decade. However, as we have seen in Chapter 8, despite the evidence of non-compliance detailed in the 2014-15 NTSB Hajj enforcement project, UK governance agencies typically lack the resources and political will to proactively enforce compliance in a niche sector of the economy. So, there is a growing understanding too that "self-governance ... is how this country works". LHO is also driven by the perceived threat of external non-trading stakeholders seeking to enforce regulation on the UK Hajj sector. Given its emergent standing in Saudi Arabia, too, LHO seems determined to finally take the lead in UK self-regulation and professionalisation.



Licensed Hajj Organisers' draft constitution and code of conduct, 2018.

In general, the existing UK regulatory framework based on ATOL and PTRs is viewed by LHO as good enough to maintain some kind of order in the marketplace. LHO has published a Code of Conduct and its executive appear highly motivated to improve standards in the sector. They have access to resources via membership fees (£500 for Munazzams, £250 for Mergee companies) and have engaged external travel consultants to train and advise members on their legal responsibilities. There is anecdotal evidence too of self-regulation already working in everyday ways. For example, when one member released advertising in the LHO forum recently it was identified as non-compliant and subsequently withdrawn.

However, a planned internal disciplinary and compliance committee along the same lines as ABTA is described as "the most important piece of work" LHO is currently undertaking. In due course there is the prospect of dealing with complaints and holding members accountable. However, there are some mixed messages at this stage concerning the appetite for cautioning or expelling members. Time will tell how widely this vision is shared and whether LHO can increase compliance.

UK Muslim community association -

[Hajj organisers] have taken everybody on board without vetting ... there should be a body who can check the conditions they have laid down ...

UK licensed Hajj organiser -

You have to ask, 'Why are the other [Munazzams] not becoming our [LHO's] members?

To avoid the charge that LHO might be a trade union simply looking after its own members' interests, an external scrutiny panel and / or advisory board of credible and independent third parties with knowledge of the UK Hajj sector and regulatory frameworks is desirable. Such work would also enable LHO to do more in terms of engaging the UK governance authorities, who at present are relatively unfamiliar with its work as compared to well-networked organisations such as CBHUK. Collaboration through the APPG on Hajj and Umrah also offers LHO a means of better communicating with pilgrims to increase awareness and understanding of the market.

9.8 Self-Regulating the Circulation of UK Hajj Visas

Longer term, there may also be a desire to see the existing UK PTRs added to in some way. While travel consultants have advised that Hajj is not the only special case under current legislation, LHO aspires for Munazzams to be the only companies allowed to sell Hajj packages in the UK. Though it is not a requirement under UK law, its representatives argue that advertising and selling Hajj packages without a Saudi Hajj licence, or without mentioning the name and number of the Munazzam who holds the visa, amounts to false representation and so is a gateway to Hajj-related fraud.

UK Muslim community association -

Why don't you [licensed Hajj organisers] recognise the fact that people are selling visas left right and centre ... Why don't you outcast them? ... Just say "You don't belong to this club"

However, rather than seek to impose the letter of the law on its members in terms of Saudi regulations, LHO's Code of Conduct proposes an 'Inter-Munazzams' Agreement'. This is at once a pragmatic yet a strategically business-focused solution. While it sanctions the widespread practice of selling visas among Munazzams, it seeks to restrict this to LHO members who will be subject to the trade association's Code of Conduct. However, while both Munazzams involved must still be present with 'their' pilgrims throughout Hajj, it is unclear to what extent the Inter-Munazzams' Agreement will be transparent to the Saudi authorities. Nevertheless, LHO is clearly seeking to draw a distinction between this gradualist self-regulating practice and

selling on visas to Munazzams who are i) not LHO members or ii) non-Saudi licensed Hajj agents without an existing ATOL sub-agency agreement with a LHO Munazzam, including random individuals and groups.

UK Muslim community association -

One of the biggest problems we have in understanding the Hajj industry is transparency in terms of how they work, how they sell their packages.

Such measures represent a first step towards self-regulation of the UK Hajj marketplace and finding some sort of harmony between Saudi and UK regulatory frameworks. LHO's plans are

ambitious given the history of the sector but they could shorten some unregulated chains of buying and selling visas and so potentially improve problems with mis-selling. However, even while making regulated sub-agency agreements more transparent, any formal recognition by UK governance authorities of the precedence of Saudi licensed Hajj organisers – and indeed LHO – would also entail a change of status for ATOL licence holders, who are not Munazzams, but are still trading legally in the UK.

A modest starting point for LHO would therefore be to try and influence the rather 'ATOL-centric' ways in which UK regulatory bodies have hitherto tended to address the public in advice about purchasing Hajj packages.



Don't lose your Hajj!

Is your operator legit?

Will you get a Hajj Visa? 

Is your agent licensed? 

Is your Hajj money safe? 

Ensure your Hajj agent is ATOL Protected & Approved by the Ministry of Hajj
Don't put your Hajj at risk, contact your agent today!

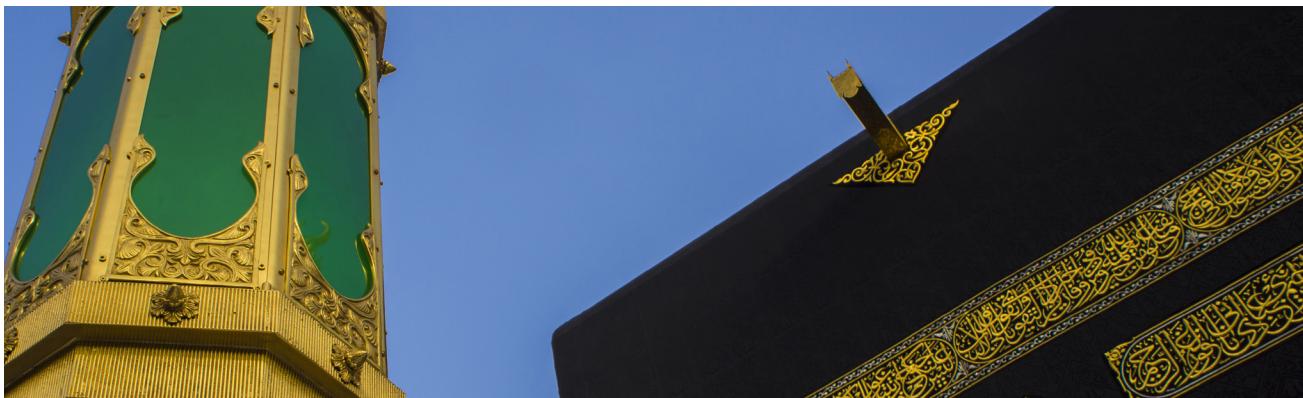
Hajj Safety Awareness Campaign
Working in Partnership

CBH UK
The Council Of British Hajjis

LHO
Licensed Hajj Organisers

*CBHUK/LHO campaign, July 2019, advising pilgrims to check their Hajj provider's Munazzam status and access to visas.
@cbhuk @LHOUKLTD via Twitter.*

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The global Hajj pilgrimage industry has been transformed over the last 30 years. In the UK, the sector is striving to professionalise and respond collectively to various key challenges. However, until now, there has a lack of authoritative and accessible information about such matters.

"The First Independent Report on Hajj-going from Britain"

Therefore, in collaboration with The Council of British Hajjis (CBHUK), the Secretariat for the new All-Party Parliamentary Group (APPG) on Hajj and Umrah, Professor Seán McLoughlin from the University of Leeds has produced, this, the first independent report mapping the dynamics of the Hajj sector in Britain.

"Collaboration and Consultation"

The report is based on Professor McLoughlin's research on Hajj-going in Britain over several years. This includes more than 30 hours of in-depth interviews with key stakeholders including:

- Hajj organisers
- UK governance authorities
- Muslim community organisations

In March 2019 all such stakeholders were also invited to three consultation events organised in London, the Midlands and the North of England.

The report was launched at a meeting of the APPG on Hajj and Umrah at Westminster on 19 June. A final, amended version of the text was published online on 1 August 2019.

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The contents of the report are the sole responsibility of Prof. Seán McLoughlin.



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